

FY2018 Air Division Operating Plan
September 15, 2017

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Executive Summary

In FY2018, the Air Division will work to improve air quality in the Region by collaborating with our state, local and tribal partners using a combination of regulatory and non-regulatory approaches. Our highest priority will be to work with our partners as they collect and report air quality information, develop State Implementation Plan (SIP) submittals, streamline permitting, and support public and private voluntary emissions reductions efforts. Specific actions include:

1. Act on at least 62 SIP submittals; maintain or improve percentage of SIP submittals acted upon within the statutory timeframe.
2. Act on the South Coast 2016 Air Quality Management Plan.
3. Expedite permit issuance by finalizing the Gasoline Dispensing Facility general permit for use on tribal lands, and act on 26 New Source Review (NSR) permitting rules including Maricopa's NSR program, Bay Area's rules, and areas with newly adopted major NSR rules that adopted a model NSR rule.
4. Provide funding and pursue strategic policies to advance air quality improvements through incentive programs, including Diesel Emissions Reduction Act grants, technology advancement program grants, and through regulatory actions recognizing incentive programs in SIPs, such as the Portola PM_{2.5} plan.

FY2018 Specific Topics

Strategic approach to state/territory/tribal/local oversight

The Air Division provides air monitoring assistance and oversight for 4 state air agencies, 4 tribes, and 29 local air districts. In FY2018, we will conduct on-site audits of four monitoring agencies (Arizona Department of Environmental Quality (ADEQ), California Air Resources Board (CARB), Bay Area Air Quality Management District (BAAQMD), and Clark County Department of Air Quality) and will continue regular calls with the agencies to assist with interpretation and implementation of regulations and guidance.

Region 9 reviews permits issued by 46 state, tribal and local agencies and issues permits mostly to facilities on tribal lands. The Clean Air Act (CAA) establishes two types of permitting programs, most of which are implemented by local and state agencies, a pre-construction permitting program (New Source Review (NSR) and Prevention of Significant Deterioration (PSD)), and an operating permit program (title V). In FY18, we will conduct a title V program evaluation for Pinal County and intend to review all major PSD permitting actions, at least 70% of NSR permitting actions, and 2% of all title V state/local/tribal permitting action. We will provide technical assistance to our state/local/tribal permitting partners and focus on projects prioritized by state and permitting agencies.

Multi-year State Implementation Plan (SIP) plans – We will meet with each of our lead state agencies, and San Joaquin Valley (SJV) and South Coast (SC), to discuss outstanding SIP submittals and agree on workload priorities between EPA, state and the local agencies. We expect to complete these meetings and update multi-year SIP management plans by February 2018.

Compliance assistance planned for industry, states, others

State Implementation Plan (SIP) Development – To bring more areas into attainment, we will support states during development of maintenance plans for areas that are candidates for redesignation to attainment. We will help California with development and timely submittal of 2008 ozone SIPs (Sacramento, Nevada County, Eastern Kern, Imperial) and 2006 PM_{2.5} SIPs (Imperial) that are vulnerable to findings of failure to submit. We will help CARB and SJV with development of SIPs to address PM_{2.5} and PM₁₀ requirements.

SIP credit for incentive programs – California agencies are relying on incentive programs for further emission reductions to meet attainment standards. We will advance these efforts by proposing action on the SC 2016 Air

Permits and Rules – We support the programmatic and functional capabilities of our state, local, tribal agencies, particularly the rural and smaller districts with limited expertise, by providing technical support and assistance with permit development. We provide technical support to the enforcement efforts regarding the application of federal standards or permit requirements. We provide clarification on regulatory requirements such as source testing procedures, identification of delegated New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) programs, and permit requirements and procedures. We perform outreach to tribes to help sources comply with tribal NSR/title V permitting requirements.

Exceptional Events – We will continue to review initial notifications and collaborate with state, local, and tribal partners to streamline the Exceptional Events process and support the states’ development of the required demonstrations.

Radionuclide NESHAP – We will complete the Radionuclide NESHAP Inspection Report for Nevada National Security Site by 2nd quarter FY18. Conduct an inspection/site visit of the Lawrence Livermore National Lab by 4th quarter. Review radionuclide NESHAP annual reports and requests for alternative monitoring.

Radiation Emergency Response – Support maintenance of RadNet radiation monitors, provide radiation emergency response support to states, and participate in one regional radiation emergency response exercise in FY18 (Q4)

Grants management and fiscal focus

We will effectively award and manage more than 120 CAA 105, CAA 103, Diesel Emissions Reduction Act (DERA), Targeted Airshed, radon, and tribal grants totaling over \$47 million, the most air grants of any Region. We will strategically utilize our grant allocation, “carry over” and deobligated funds to support the highest priority needs of our air districts with several important projects, such as the Clean Air Technology Initiative, California ozone monitoring support, near-roadway monitoring, and replacing wood/coal stoves, trucks, lawn equipment, and tractors. We will meet or exceed the national deadlines and requirements for utilizing our available Continuing Resolution funding, as well as the national metrics for awarding and completing a percentage of grant actions. We will meet or surpass regional deadlines and targets for awards prior to the 4th quarter, baseline reporting, grants close-out, and advanced grants monitoring.

Improve Air Quality (Goal 1)

Objective 1.1 – Improve Air Quality: Work with states to accurately measure air quality and ensure that more Americans are living and working in areas that meet high air quality standards.

National Role

As Lead Region for the Office of Air and Radiation (OAR), we will support OAR’s communication with the ten regions, provide regional participation on agency priorities, and provide regional perspectives regarding programmatic measures, budget, and implementation of the CAA.

Regionwide

- o SIPs - Consistent with national performance measures to reduce the SIP backlog, take final action on at least 62 SIP submittals. We will maintain or improve our percentage of SIP submittals acted upon within the statutory timeframe.
- o Make progress towards reducing the number of nonattainment areas by working with state and local

- partners to redesignate areas attaining ambient air quality standards. In FY18, we expect action on Chico, CA for 2006 PM_{2.5}.
- o Through the West Coast Collaborative (WCC) – a public private partnership dedicated to reducing diesel emissions – provide outreach and assistance on funding, technology, and policy developments.
 - Coordinate development and modernization of key corridors with alternate fuel infrastructure. Steering Team plans to formally approve corridor plan. (summer 2018)
 - Award and manage Diesel Emissions Reduction Act (DERA) funding and support state efforts to effectively utilize VW settlement funding. (Sept 2018)
- o Continue efforts with Department of Energy on aggregated federal solar procurement for federal agencies. Explore other economic opportunities to transition to cleaner energy sources.
- o Coordinate with industry and public stakeholders on goods movement issues, addressing localized community concerns. Develop the San Pedro Ports Clean Air Action Plan (CAAP) Case Study as a national resource to assist other U.S. port authorities in producing clean air plans. (Q4)
- o Provide our state and local agencies implementation support for revised photochemical assessment monitoring station (PAMS) requirements and development of enhanced monitoring plans. (Q4)
- o Finalize Round 3 designations for the 2010 SO₂ standard by December 31, 2017. (Q1)
- o Proceed with ozone designations for attainment areas. (Q1). Per EPA HQ schedule, designate any remaining areas that were not designated in October 2017. (Q3-4)
- o Work with states on 2008 ozone Finding of Failure to Submit plans.
- o 2014 National Air Toxics Assessment (NATA) – Work with states to review draft risk data (Q1 and 2); work with HQ and regional partners on communication strategy. (Q 3 and 4)
- o Work on addressing high rates of asthma through outreach and training, as well as sustainable financing. Conduct Healthy Homes and Asthma Triggers training, asthma financing webinars, award grants to Imperial Valley Child Asthma Program (IVCAP) and Breathmobile, and distribute asthma kits to hospitals and clinics.
- o Provide technical support to CA Statewide Wood Smoke Reduction program.
- o Support innovative truck exchange pilot projects to leverage use of incentive funding for near zero emission trucks.
- o U.S.-China Green Ports and Vessels Initiative – promote sustainable goods movement practices in both regions by facilitating international engagements, with a focus on emission reduction opportunities for ports and vessels.

CA South Coast

- o Propose and finalize remedies for disapproval issues related to SC 1997 PM_{2.5} plans to stop sanctions. (Q1)
- o Take appropriate action on SC 2016 Air Quality Management Plan (AQMP)
 - Propose actions on SC 2006 PM_{2.5} serious area plan and 2012 PM_{2.5} moderate area plan (impracticability demonstration and bump-up to serious). (Q2-4)
 - Propose action on SC extreme ozone plan including use of incentives, commitments and future clean technologies. (Q4)
- o Act on four NSR rules currently in the backlog including Rule 1325 that lowers the major source threshold from 100 to 70 tons per year to comply with SC's new status as a serious PM_{2.5} nonattainment area. (Q2-4)
- o Continue to work with CARB, SC and other stakeholders to advise the San Pedro Bay ports on the development of the Clean Air Action Plan update, ensuring the plan is consistent with the AQMP and CA's Sustainable Freight Action Plan goals and measures. Promote and advance incentives for port stakeholders to adopt currently available zero and near-zero mobile source emissions technologies.

- o Assist regional partners on community air toxics issues. (as needed)
- o Continue air toxics risk support on the Aliso Canyon health study workgroup, the Multiple Air Toxics Exposure Study V technical advisory group, as required.

CA San Joaquin Valley

- o Act on SJV's NSR rule revisions; submittal expected in October 2017. (Q4)
- o Continue working on full implementation of corrective action plans from 2011 air monitoring program technical systems audit. (Q4)
- o Work with California on SIP submittal of PM_{2.5} contingency measures to address disapproval under 1997 PM_{2.5} plan – take appropriate action to stop sanctions clocks. Submittal expected in November 2017. (Q1)
- o Work with state/district on development and submittal of integrated PM_{2.5} plan for SJV. (Q1-2)
- o Review and take appropriate action on SJV 2016 plan for 2008 ozone. (Q4)
- o Finalize Bakersfield ozone monitoring approval. (Q1 or Q2)
- o Support technology advancement and incentive programs to reduce pollution in SJV.

CA Sacramento

- o Act on several Sacramento/collar county Volatile Organic Compound (VOC) rules. (Q3)
- o Work with CARB/Sacramento on development and submittal of ozone plan to address 2008 ozone standard.
- o Work with district on development of 1-hour and 1997 8-hour ozone redesignation substitutes.

CA Bay Area

- o Finalize action on the BAAQMD emissions banking rule for a November 1 consent decree deadline. (Q1)
- o Conduct the 2018 technical systems audit of BAAQMD's air monitoring program, issue audit reports and corrective action plan reviews. (Q1-4)
- o Continue addressing Oakland's port/city/Oakland Army Base air, Environmental Justice and title VI issues. Work with partner agencies at federal, state and local levels, community and other stakeholders to mitigate the impacts of the Oakland Army Base development.

CA Other

- o Act on Mojave's reasonable available control technology (RACT) SIP demonstrations. (Q2)
- o Act on San Diego prohibitory rules. (Q2)
- o Act on SIP submittals related to Portola residential wood burning. (Q2)
- o Propose action on Mojave permitting rules. (Q4)
- o Propose action on NSR rules for Antelope, Mojave, Butte, and Santa Barbara. (Q3)
- o Propose action on San Diego NSR rules. (Q4)
- o Finalize PSD permit action for the Palmdale Energy Project in Antelope Valley. (Q1)
- o Propose action on Yolo-Solano's title V program revisions. (Q4)
- o Begin the 2018 CARB technical systems audit, and continue work on implementation of corrective action plans from the previous air monitoring program audit. (Q4)
- o Work with CARB on development, adoption and submittal of Chico, CA (Butte County) redesignation to attainment for the 2006 PM_{2.5} standard, and take appropriate action. (Q4)
- o Review and act on (including budget adequacy) submitted ozone plans for the 2008 ozone standard: Ventura (serious), Western Mojave Desert (severe), Coachella (severe), San Diego (moderate).
- o Act on Plumas County PM_{2.5} Plan, including SIP credit for woodstove incentives. (Q3-Q4)
- o Propose and finalize CA waiver measure submittal for 5 additional rule amendments. (Q2-Q4)

Arizona

- o Propose action on rules regulating emissions from Arizona smelters. (Q3).
- o Act on Maricopa's NSR program revisions. (Q2)
- o Act on Arizona's NSR rule corrections addressing their limited approval/disapproval. (Q2)
- o Conduct title V program evaluation for Pinal County. (Q4)
- o Conduct the 2018 technical systems audit of ADEQ's air monitoring program, and issue audit reports and corrective action plan reviews for Pima, Maricopa, Pinal, and ADEQ. (Q4)
- o Continue working with Randolph, AZ, Pinal County and others to assess and address community air quality concerns from the Western Emulsion asphalt facility.
- o Act on:
 - SO₂ SIPs for Miami and Hayden (Q3-Q4)
 - Lead SIP for Hayden (Q4)
 - AZ Regional Haze 5-year Progress Report (Q4)
 - Maricopa ozone plan for the 2008 ozone standard
 - Maricopa PM₁₀ plan requirements based on monitoring data
 - West Pinal PM₁₀ Plan after obtaining additional information from Pinal County and Maricopa Association of Governments.
 - 2nd 10-year maintenance plans for San Manuel and Douglas-Paul Spur (Q1-2 for proposals, Q3-4 for finals)
- o Work with state/locals on development of attainment and maintenance plans for PM₁₀ areas including: Yuma, Nogales, Ajo, Rillito, Hayden and Miami.
- o Work with state/local/tribes on redesignation request and maintenance plan for Phoenix PM₁₀, including resolution of exceptional events. (on-going)
- o Finalize AZ's nitrogen dioxide and SO₂ infrastructure SIPs after resolution of PSD issue. Proposal is ready as soon as PSD issues are resolved. (Q2-4)

Nevada

- o Propose action on Clark County's title V program revisions. (Q4)
- o Conduct the 2018 technical systems audit of Clark County's air monitoring program, and issue audit reports and corrective action plan reviews for Nevada Division of Environmental Protection (NDEP), Washoe, and Clark. (Q2-4)
- o Work with NDEP to document rescission of Reid-Gardner Best Available Retrofit Technology BART Federal Implementation Plan. NDEP plans to submit documentation by Q2.
- o Act on NV SO₂ transport infrastructure SIP. (Q3-4)
- o Facilitate coordination between NV, CA and federal land managers to address air quality impacts of wildfires.

Hawaii and Islands

- o Continue to provide permitting guidance to the Pacific Islands and assist them with permitting decisions.
- o Utilize DERA funding to support the transition in American Samoa from diesel-fueled electricity to solar. Support new project development with island grant recipients.
- o Issue final air monitoring program technical systems audit report; work with Hawaii on corrective action plans. (Q4)

Tribes

- o Build tribal capacity by awarding and managing 30 CAA grants to Region 9 tribes.

- o Conduct technical systems audits of Gila River and Pechanga's air monitoring programs, and issue audit reports and corrective action plan reviews for Morongo, Salt River, Pechanga, and Gila River. (Q1-4)
- o Finalize "General Permit for Gasoline Dispensing Stations" for CA tribes. (Q1-2)
- o Manage DERA Tribal grants and support the utilization of VW Settlement funds.
- o Continue to process tribal NSR permits in a timely manner.
- o Provide support to tribes on permitting requirements, air planning and designations, monitoring, and emissions inventories, and indoor air.
- o Consult with tribes on EPA actions.
- o Act on La Jolla's Treatment as State application. (Q1)

Partnerships and Public Participation (Goal 2-Cooperative Federalism)

Objective 2.1 - Streamline and Modernize: Improve permitting and reduce unnecessary or duplicative reporting burdens that impede economic growth."

- o Transition several Lotus-Notes databases to other platforms, including the Rules comment letter database and the applicable SIP database. (Q3)
- o Work with state and local agencies to continue to streamline permit conditions.
- o Support state, local, and tribal agencies by refining the air monitoring Technical Systems Audit (TSA) process. (Q4)

Objective 2.2 - Enhance Shared Accountability: Improve environmental protection through joint governance and compliance assistance among state, tribal, local, and federal partners.)

- o Work closely with state and local air pollution agencies along the U.S./Mexico border to coordinate efforts, share knowledge and reduce air pollution impacts in the U.S./Mexico border region.
- o Continue to conduct outreach, training, and technical assistance on indoor air quality to tribes.
- o Support the Imperial County Environmental Justice Task Force.
- o Work with schools to identify best practices to improve indoor air quality and reduce exposure to near-road pollution, including use of the Tools for Schools program, air flag program, and near roadway guidance document.
- o Provide 2 trained staff to assist the US Forest Service with wildfire tasks such as air quality monitoring, outreach, and reporting.
- o Support development of Exceptional Events guidance documents, including ozone wildfire, prescribed fire, and high wind dust guidance. (Q4)
- o Support development of national Regional Haze guidance focusing on finalizing the metrics for the program. (Q4)

Objective 2.3 – Increase Transparency and Public Participation: Listen to and collaborate with communities and provide additional platforms for public participation and engagements.

- o To streamline the process for revising SIP requirements, publish Phase II of our conversion to the California SIP notebook. This will add to the Code of Federal Regulations (CFR) a table listing the versions of local rules currently federally approved and enforceable for 5-15 California air pollution control agencies, clarifying the applicable SIP requirements to the public. (Q3)
- o Engage with and provide technical support to CA Statewide Wood Smoke Reduction program.
- o Support clean energy partnerships including California funding efforts to promote dairy digesters and the broader utilization of biogas.

- o Meet regularly with stakeholder groups such as the CA Pollution Control Officers Association, Regional Tribal Operations Committee (RTOC), The Western States Air Resources Council (WESTAR) to foster exchange of information and effective communication.
- o Permitting:
 - Work with HQ to continue to develop electronic systems to allow broader electronic reporting by facilities.
 - Work with HQ to develop national database to allow states to submit electronic permit submittals for title V review to improve EPA review efficiency.
 - Continue to engage with state/local permitting agencies on controversial projects to assure a smooth public participation process.

Science and Regulatory Process (Goal 3-Rule of Law and Process)

Objective 3.2 – Prioritize Robust Science: Refocus the EPA’s robust research and scientific analysis to inform policy making.

- o EPA will provide administrative and technical assistance for a CARB grant examining how nocturnal chemistry affects particulate matter concentrations in the SJV. (Q1 – Q3)
- o Navajo Wood and Coal Stoves – Complete testing of stoves and begin implementation of Four Corners Power Plant stove changeout program. (Q1; Q3) Begin pilot monitoring study. (Q2)
- o Continue vegetation barrier research at Brookfield Elementary in 1st and 2nd quarters (expanding RESES-funded research via the ORD Innovation Grant funding). Throughout fiscal year, pursue other near-road mitigation research opportunities within the Region (including new RARE/RESES grant proposals). (Q1, Q2)
- o Help advance sensor technology research and communication tools.
 - Provide technical support for the development of Office of Research and Development’s (ORD) Wildfire Sensors Challenge, which seeks a field-ready prototype air sensor system to monitor pollutant concentrations during wildland fires.
 - Assist ORD to publish a report summarizing SC AQMD’s RARE grant-funded performance evaluations of sensor pods and recommendations for the use of air sensor technologies. (Q2)
 - Analyze air quality monitoring data from the EPA-Aclima sensors partnership in the San Francisco Bay Area in support of near roadway measurements, communities, and citizen science, as funded by a recent RARE grant.
 - Provide technical support for the \$2 million Imperial County Community Air Monitoring Project (w/Comite Civico del Valle) funded by the National Institutes of Health in collaboration with the Public Health Institute’s California Environmental Health Tracking Program and the University of Washington.
- o Provide support for the California Baseline Ozone Transport Study (CABOTS), to improve our understand of ozone formation and transport in California; use the Community Multiscale Air Quality (CMAQ) model to evaluate 2016 wildland fire smoke impacts on regional air quality in California.
- o Work with Clean Air Technology Initiative partners to develop, demonstrate and deploy zero and near-zero emission mobile source technologies and projects in California.

Objective 3.3 – Create Consistency and Certainty: Outline exactly what is expected of the regulated community, to ensure good stewardship and positive environmental outcomes.

- o Assist Pinal and Pima Counties to update their NSR permitting rules as needed.
- o Continue support for Maricopa County as they develop VOC and NO_x rules to demonstrate compliance with RACT requirements.
- o Support ADEQ with lead and SO₂ plan development.

- o Assist SC on implementation of action items from the title V program review.
- o Assist SC on corrective action plans to address air monitoring program audit findings. (Q4)

Objective 3.4 – Improve Efficiency and Effectiveness: Provide proper leadership and internal operation management to ensure the Agency is fulfilling its mission.

- o Streamlining SIP actions – Support national efforts to evaluate and improve SIP processing, share best practices, ensure SIP consistency, and improve tracking and submittals (SPeCS for SIPs).
- o Participate in monthly training on the use of the Community Multiscale Air Quality (CMAQ) modeling system and the Comprehensive Air Quality Model with extensions (CAMx) and visualization software to support review of future attainment area SIPs and Regional Haze submittals.

Workforce Priorities & Communications

Resource and Personnel Management

- o Fully use training, travel, and discretionary funds (over 98%).
- o Finalize and implement the Air Division Training Strategy.
- o Scope and initiate divisional efforts for strategic workforce planning.
- o Expeditiously fill vacancies, as possible given regional and national hiring restrictions.
- o Present at the Annual EPA/Tribal Conference (October).
- o Hold quarterly all-hands meeting to share information and network.

Communications

- o Present and engage with stakeholders at the California Desert Air Working Group, California Council for Environmental and Economic Balance (CCEEB), Western States Air Resources Council (WESTAR), Association of Air Pollution Control Agencies (AAPCA) and National Association of Clean Air Agencies (NACAA).
- o Hold media and award events focusing on DERA and Targeted Airshed Grants (Q1-2).
- o Release success stories resulting from grants or collaboration through press releases, web and social media.
- o Ensure timely FOIA responses.

FY2018 Land Division Operating Plan

September 15, 2017

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Appendix – FY18 Draft ACS Bids and Performance Indicators

Executive Summary

In FY18, Land Division will continue to emphasize high performance, technical and scientific rigor, community engagement, and close partnerships with states and local partners. We will focus on hazardous waste, underground storage tank, and PCB sites where EPA has a lead role and where state partners have requested our involvement. Specifically, we will dedicate significant resources and attention to addressing fuel releases and improvements at the Navy's Red Hill Bulk Fuel Storage Facility in Hawaii, and to Chemical Waste Management's request to expand TSCA PCB activities at their Kettleman Hills facility in California. In our leadership role with underserved communities, a major emphasis will be negotiating EPA-Tribal Environmental Plans with approximately 130 tribal general assistance program grantees, and continuing our binational role in addressing international environmental impacts to the U.S. including sewage spills and other air, water, and waste pollution. In addition, we will continue to place a high priority on our pesticide worker protection standards outreach to state and tribal pesticide agencies, agricultural workers, industry, and health care organizations.

I. FY18 Specific Topics

Strategic Approach to State/Territorial/Tribal/Local Oversight and Support: Land Division implements widely diverse programs, and our approach to oversight and capacity building varies by program. Tribes and the Pacific island territories continue to build environmental capacity and implement comprehensive programs, and in some cases applying for formal federal program delegations (e.g., Gila River pesticide applicator certification program). As TSCA, RCRA, and FIFRA regulations are revised, we are working with authorized states, tribes, and Pacific island territories to build authorities and capacity as needed, and complete updated legislative and regulatory program authorizations and agreements. In the RCRA programs we are comprehensively updating MOAs with all R9 states and reviewing laws and regulations to ensure consistency with federal programs. At some high-priority hazardous waste and PCB cleanup sites (e.g., Riverside Ag Park and Exide), we are on the ground with state partners ensuring cleanup efforts are protective of human health and the environment.

Compliance Assistance for Industry, States, and Others: In the TSCA, RCRA and FIFRA programs, we are focused on targeting assistance and technical support where needs are greatest and when our regulatory partners request assistance (e.g., CA DTSC draft hazardous waste permit reviews; HI Department of Agriculture FIFRA challenges; unique and controversial sites like the Red Hill UST facility, HI). We continue to implement new and creative means to identify those needs, provide local assistance, and engage state agencies in those efforts (e.g., pesticide worker protection assistance to the agricultural industry and community organizations; lead paint hazard and IPM outreach to communities at risk; reducing stalled LUST cleanups in CA communities). We also continue to expand R9's PCB Lean "toolbox" with industry, states, and other regions nationwide, which streamlines the cleanup process. Additionally, we are helping industry and states prepare for new hazardous waste electronic reporting systems, and working to improve communication nationally in our role as sub-lead region for RCRA information systems.

Grants Management and Fiscal Areas of Focus: We continue to emphasize fiscal responsibility in all grants and contracts throughout the year. As tribes and the Pacific islands build environmental capacity, they often need assistance to build administrative and financial management capacity. In CNMI and Guam, we are ensuring compliance with OIG recommendations to improve grants management. We also continue to emphasize fiscal accountability with our 130 tribal GAP recipients by providing technical assistance and training, as well as grant reductions, enforcement, and OIG referrals when appropriate. In the RCRA and FIFRA programs, we closely monitor and work with state, tribal, and territorial grant recipients to ensure measurable commitments are met throughout the year. We are also working nationwide to establish new and improved processes through LEAN lessons learned in RCRA contracting.

Note: July 17, 2017 “Draft FY18-22 EPA Strategic Plan Framework” goals and objectives are identified in parentheses following each sub-heading. Additional objectives are noted following actions that accomplish more than one objective.

II. RCRA and TSCA PCBs

State/Tribe/Territories Program Development and Compliance Assistance *(Revitalize Land and Prevent Contamination)*

Hazardous Waste:

- With state partners, complete at least 12 hazardous waste permit renewals. (FY18)
- Review at least 8 state hazardous waste permits. (FY18)
- With state partners, complete at least 6 hazardous waste corrective action remedy construction determinations. (FY18)
- Award FY18 state and Pacific island hazardous waste grants (Sept); conduct FY17 end-of-year reviews. (Jan)
- Assume national RCRA sub-lead for e-Manifest and RCRAInfo programs. (Oct) *(Improve Efficiency and Effectiveness)*
- Support and ensure R9 states are ready to use the new e-Manifest system (June) and e-RCRA Biennial Report (e-BR) system to upload data and conduct quality control in time for national publication. (March-Dec 2018) *(Enhance Shared Accountability)*
- Conduct outreach to R9 tribes, unauthorized territories, and industry in these geographic areas to launch new RCRAInfo, e-Manifest, e-BR, and e-Notifications. (Jan-March) *(Create Consistency and Certainty)*
- Update RCRA state authorization, including MOAs, as applications are received: *(Enhance Shared Accountability)*
 - ADEQ: Publish final rule and newly negotiated MOA. (Oct)
 - HDOH: Publish proposed rule and newly negotiated MOA. (Jan)
 - NDEP and Guam: Begin discussions to update MOA (June); no new authorization applications expected in FY18.
 - DTSC: Continue review of new authorization package for Universal Waste and Post-Closure Rules, and discussions to update MOA. (Oct-March)

- Coordinate referral of RCRA financial assurance deficiencies to EPA or state enforcement per National Financial Assurance Strategy. (Oct) *(Create Consistency and Certainty)*

Underground Storage Tanks:

- Work with HI and NV to update State Program Approvals (SPA). (FY18) *(Enhance Shared Accountability)*
- Award state/tribal LUST grants (Sept); conduct end-of-year reviews (Dec). *(Enhance Shared Accountability)*
- Partner with states to complete at least 500 LUST cleanups. (FY18)
- Complete at least 4 UST cleanups in Indian country. (FY18)

High Priority Sites *(Revitalize Land and Prevent Contamination)*

Hazardous Waste and TSCA PCB Permits:

- CWM Kettleman Hills Facility – meet with community (Oct, March, Aug); propose draft TSCA PCB permit (Sept). *(Streamline and Modernize, Increase Transparency and Public Participation)*
- Finalize the Evoqua RCRA permit decision. (Jan)
- Oversee ongoing implementation of Exide facility closure plan. (FY18)
- Work with CNMI to renew the permit for their public safety facility which stores unexploded ordnance found on island. *(Create Consistency and Certainty)*
- Resolve regulatory issues with states regarding RCRA hazardous waste landfill permits at Clean Harbors Buttonwillow, CA and U.S. Ecology, NV. *(Create Consistency and Certainty)*

Hazardous Waste and TSCA PCB Corrective Action:

- Remove 400,000 pounds of perchlorate at the former Tronox site in Henderson NV. (Sept)
- Approve at least 10 cleanups of PCB-contaminated sites. (FY18)
- Resolve remaining PCB cleanup issues to allow ITT Cannon in Santa Ana, CA, to implement \$100 million redevelopment. (May)
- Resolve any PCB cleanup issues to allow United Technology to initiate their \$3 billion redevelopment in Canoga Park, California. (May)
- Complete off-site investigation and PCB cleanup of Riverside Ag Park to allow housing development to proceed. (Feb)

Underground Storage Tanks:

- At the Red Hill Bulk Fuel Storage Facility, HI:
 - Complete installation of four new wells to support groundwater model development. (Dec)
 - Review and approve tank upgrade alternatives report. (Jan)
 - Review and approve plans which support the site assessment activities and groundwater flow patterns (Oct. 2018)
 - Hold a public information meeting. (Feb)
 - Review and approve Navy tank upgrade decision (June)
- Conduct additional soil gas sampling at the Davis Chevrolet LUST site (Tuba City, AZ/Navajo) to evaluate the potential for vapor intrusion to nearby homes. (March)

Program Initiatives *(Revitalize Land and Prevent Contamination)*

Hazardous Waste and TSCA PCBs:

- Initiate eight Greener Cleanup Best Management Practice Evaluations, including 4 state-lead RCRA sites. (FY18) *(Enhance Shared Accountability)*
- Add two additional tools to Region 9's PCB Lean "toolbox" for streamlining PCB cleanups nationally and conduct three outreach events to promote this tool. (Sept) *(Streamline and Modernize)*

Underground Storage Tanks:

- Complete a two-region pilot of a National Tribal Database (developed by R9) and expand to other regions. (Sept) *(Increase Transparency and Public Participation)*
- Conduct a comprehensive review of 70 past tribal LUST case closure decisions to ensure the sites remain protective. (Sept)
- In partnership with CA, reduce the number of stalled LUST cleanups by 40 percent (baseline is 1,083 sites). (Sept)

III. Pesticides (FIFRA) and Worker Protection

State/Tribe/Territories Program Development and Compliance Assistance *(Ensure Safety of Chemicals in the Marketplace, Enhance Shared Accountability, Create Consistency and Certainty)*

- Approve Gila River Indian Community plan to certify pesticide applicators (RA with OCSPP AA concurrence). (May)
- Award state and tribal pesticide grants (Sept); conduct end-of-year reviews (Oct-Nov); submit final reports to HQ (Feb).
- In coordination with ENF, continue to work with HI Dept. of Agriculture to ensure implementation of action plan to address enforcement primacy issues including:
 - Filling vacant case developer positions (Oct-Dec);
 - Developing and implementing enforcement ticket protocol (Oct-Mar).
- Build programmatic capacity in Pacific islands to: update pesticide regulations in Palau (Dec); submit a FIFRA Section 18 application for addressing the Coconut Rhinoceros Beetle in Guam (Jan); train applicators and growers at food safety summit in CNMI (Qtr 3), and; develop an outreach campaign in multiple languages to address pesticide residue concerns.
- Assist Office of Pesticide Programs Worker Safety Regulation Team on expected amendments to the revised WPS and Certification rules. (Feb-Sept)
- Provide technical support to OCSPP to complete development and implementation of the new national model cooperative agreement workplan and reporting system. (March, Sept)

Program Initiatives *(Ensure Safety of Chemicals in the Marketplace, Enhance Shared Accountability, Create Consistency and Certainty)*

- Implement outreach plan on Worker Protection Standards for states, tribes, territories, farmworker and other community organizations, and industry groups. (FY18)

- State Lead Agencies and Tribes: Disseminate outreach materials and provide technical assistance on implementing WPS; solicit input on proposed amendments to WPS and C&T regulations. (Jan-May)
- Agricultural Workers: Provide training for promotores, health care providers, community health centers, environmental justice task forces, farm worker service organizations, Department of Labor (200 trainees with potential to reach 5,000-10,000 farmworkers and their families). (FY18)
- Industry: Work with Ag Safe, California Farm Labor Contractor Association, Western Growers Conference, Arizona Interagency Farmworker Coalition, etc. (500-1,000 industry representatives). (FY18)
- Train State Inspectors: Provide training for state inspectors on breaking communication barriers with workers/handlers during WPS inspections; support pesticide inspector training developed by SLAs (50 inspectors). (FY18)
- Provide technical assistance through TPPC National Pollinator Workgroup for tribes to use the R9-developed Pollinator Protection Plan template/guidance (anticipate 5-10 tribes will develop plans using the tool). (FY18)
- Process ~650 Pesticide Notices of Arrival. (FY18)
- Complete Region-specific project per FY18-19 NPM Guidance: develop podcast or other outreach material on Integrated Pest Management (IPM), with focus on bed bugs and disease vectors e.g., (mosquitoes, ticks, etc.), specifically for multi-cultural populations. (FY18 ACS measure)
- Implement national Integrated Pest/Vector Management Program.
 - Increase partnerships with regional organizations that work with schools and other local organizations to promote adoption of IPM programs (5 new partnerships). (FY18)
 - Provide outreach, training, and technical assistance on Integrated Pest/Vector Management depending on available resources (5 presentations/workshops). (FY18)
 - Disseminate outreach materials and tools developed or provided by the IPM Center of Expertise. (FY18)
- Implement revised Pesticide Applicator Certification Rule (predicted effective date: May 2018). Develop plan for outreach and training to ensure that states, tribes, territories, and other stakeholders are prepared to implement the rule. (March)
- Process approximately 100 certifications under the national federal certification plan for pesticide applicators in Indian country. (FY18)

IV. TSCA, Children's Health, and Environmental Education

New TSCA Legislation (*Ensure Safety of Chemicals in the Marketplace*)

- Participate in national rulemaking workgroups of regional and state interest including trichloroethylene, dichloromethane, and n-methyl pyrrolidine. (ongoing)
- Work with state agencies and small businesses to identify alternatives to the first 10 chemicals under the new TSCA framework. Ensure industry and state agencies are aware of the rulemaking schedule and participate in the process as interested. (Dec-July)
- Support roll-out of the new formaldehyde rule to reduce exposures from treated wood products. (Final rule delayed - TBD)

Lead and Asbestos Program Development and Compliance Assistance *(Ensure Safety of Chemicals in the Marketplace)*

- Award lead-based paint program grants to CA and HI; conduct grant oversight. (Aug) *(Streamline and Modernize)*
- Award Asbestos enforcement grant to HDOH and work with HDOH to submit an “AHERA program waiver” to obtain federal program equivalency. (Dec) *(Streamline and Modernize)*
- Accredite approximately 20 and audit 15 lead-based paint training providers that conduct Lead Safe Work Practices training for contractors and other professionals. (ongoing) *(Create Consistency and Certainty)*
- Provide outreach material and technical assistance to over 100 state, local and private health services organizations to develop local and tribal capacity to train residents on lead hazards, conduct blood lead screenings, and provide treatment information for lead-poisoned children. (ongoing) *(Enhance Shared Accountability)*
- Provide technical assistance to three local governments to enable them to adopt Lead Renovation, Repair, and Painting (RRP) requirements through local ordinances or changes to building permit application processes.
- Work with Contractors State Licensing Boards to educate registered contractors who may be affected by the Lead Renovation Rule. (June) *(Enhance Shared Accountability)*
- Conduct free Lead-based Paint Training for low-income contractors in Los Angeles, San Diego and Phoenix. (Oct, Feb, June) *(Create Consistency and Certainty)*

Children’s Health and Environmental Education *(Improve Air Quality, Provide Clean and Safe Water, Increase Transparency and Public Participation)*

- Promote environmental health considerations when renovating schools through training, outreach and technical assistance (e.g., LAUSD School Renovation Workshop, Oct; Green School Summit, Pasadena, Nov; CA Assoc. of School Building Officials Meeting, March).
- Promote Air Quality Flag program to schools throughout R9 and hold at least three workshops on implementing the program (San Pedro, Los Angeles, Phoenix, Oct-May)
- Organize internal and external Children’s Health month events. (Oct)
- Utilize Office of Children’s Health Protection Interagency Agreement with HUD to conduct at least three Healthy Homes Trainings in overburdened communities and provide outreach assistance to engage community health workers and community-based organizations in developing programs. (Nov-May)
- Select and award three FY18 Environmental Education grants and manage four FY17 grants. (Nov)
- Evaluate and select recipients of the Presidents Environmental Youth Award for students and the Presidential Innovation Award for Environmental Educators. (Apr)
- Support Environmental Education Teacher and Student awards ceremony at White House EE Summit. (Aug)
- Work with the Drinking Water Office on an initiative to test for lead in drinking water at more than 30 tribal schools and daycares. Provide technical assistance to address any levels above the action level in the Lead and Copper Rule. (ongoing)

- Collaborate with 5 state and local childcare organizations to provide training and technical assistance to early education centers on children's environmental health and indoor environment issues. (ongoing)
- Select, award and manage two or more children's environmental health grant projects in the U.S.-Mexico border region. (Oct)

Community Revitalization *(Enhance Shared Accountability)*

- Provide contractor and technical support to Ukiah, CA and Nogales, AZ to implement Local Foods, Local Places projects. Ukiah will redevelop the county courthouse into a community kitchen and Nogales will expand opportunities for agricultural entrepreneurs. (ongoing)
- Provide technical assistance to two communities as part of EPA's Building Blocks Program. In Bishop, CA, help complete a "smart growth for rural communities" assessment. In Apache Junction, AZ, help identify obstacles to infill development and options for attracting development to distressed areas. (Oct-Jan)

V. Zero Waste

Sustainable Materials Management *(Revitalize Land and Prevent Contamination, Create Consistency and Certainty, Improve Efficiency and Effectiveness, Cooperative Federalism)*

- Recruit and retain over 25 Food Recovery Challenge participants that will track and report food waste reductions. (FY18)
- Recruit and retain over 30 federal agencies in the Federal Green Challenge and reduce environmental impacts and costs in at least two of six areas: electronics, energy, purchasing, transportation, waste, and water. (Sept)
- Recognize Federal Green Challenge, Food Recovery Challenge, and WasteWise award winners with press and web outreach. (FY18)
- Collaborate with Hawaii, Pacific islands environmental programs, DOD, and island stakeholders to advance a framework for zero waste management. Assist Hawaii, Guam and CNMI in calculating recycling rates and solid waste management planning. (FY18)
- Make waste management more efficient by promoting the Energy Star Portfolio Manager Waste Tracking tool through webinars and conference presentations, and pilot reporting using Portfolio Manager with WasteWise participants. (Jan)
- Develop Built Environment Resilience Analysis to support improved regional disaster preparedness and disaster debris reduction. (Apr)
- With ORD, conduct an analysis of solid waste combustion and conversion technologies and develop a Decision Makers Guide to help under resourced communities make science-based decisions. (Sept)

Pollution Prevention *(Revitalize Land and Prevent Contamination, Ensure Safety of Chemicals in the Marketplace, Enhance Shared Accountability, Increase Transparency and Public Participation, Create Consistency and Certainty, Improve Efficiency and Effectiveness)*

- Through pollution prevention grants and technical assistance, accomplish the following reductions: 500,000 gallons of water; \$40,000 in government and business costs; 4,000,000 pounds of hazardous materials; and 80,000 MTCO₂e emissions. (FY18)

- Though a CA Air Resources Board grant, support expansion of the California Green Business Program to disadvantaged communities (FY18) and host a webinar with the national EPA-State pollution prevention workgroup to share the California Green Business model with states across the country (Oct).
- Deliver five green graffiti removal trainings to local government. (Oct -Jan)
- Host two food manufacturing stakeholder meetings (N and S CA) and provide technical assistance to food manufacturers to promote sustainable food management using source reduction, process management, and other food waste reduction strategies. (FY18)
- Recruit four state or local governments to use Safer Choice label in procurement. (Qtr 4)

Solid Waste Management (*Revitalize Land and Prevent Contamination, Prioritize Robust Science, Cooperative Federalism*)

- Support development and adoption of four Tribal Integrated Waste Management Plans.
- Improve waste management capacity at 10 tribes with EPA technical assistance. (FY18)
- Pilot community based social marketing for tribal materials management with Pala Band of Mission Indians. (March)
- In Guam, continue to work with the federal court-appointed receiver and DOJ to complete consent decree projects tied to the Layon Landfill and Ordot dump closure. (FY18)
- Make determination on flexibility request for Cocopah landfill closure through a federal site-specific rulemaking. (Sept)
- Continue work with the Cortina Band on review of a proposed regional solid waste landfill. (ongoing)

VI. Tribes

Grant Management and Capacity Building (*Core Mission, Enhance Shared Accountability*)

- Award approximately 130 grants totaling more than \$16 million and provide technical support to protect 27 million acres of land and the health of 450,000 reservation residents. (Sept)
- Negotiate EPA-Tribal Environmental Plans (ETEPs) with tribal grantees. (100% of all grantees by Sept) (*Increase Transparency and Public Participation, Create Consistency and Certainty*)
- Provide training to tribal environmental professionals on project management, time management, strategic planning, and other core approaches to promote broader success of tribal programs. (Aug)
- Promote sustainable tribal programs by providing training on tribal environmental planning, as well as by providing technical assistance to tribes under the GAP. (quarterly/ongoing)
- Reduce environmental health stressors in 50 tribal communities by cleaning up more than 30 open dumps, hosting 19 cleanups of e-waste, hazardous waste, tires and debris, and drafting or revising 14 Integrated Solid Waste Management programs. (Sept) (*Revitalize Land and Prevent Contamination*)

Communication and Coordination (*Enhance Shared Accountability, Increase Transparency and Public Participation*)

- Coordinate four Regional Tribal Operations Committee meetings (Oct, Jan, April, Aug) and monthly Regional Indian Program Steering Committee meetings to improve regional awareness and collaboration around tribal issues.
- Convene a Regional Tribal Conference to promote sharing of information and best practices with and among tribes; attendance estimated at 450 tribal representatives, 50 Agency personnel. (Oct) *(Core Mission, Create Consistency and Certainty)*
- Engage with other federal agencies toward common goals via leadership on the Federal Regional Council Tribal Workgroup and by building stronger management-level relationships with partner agencies. (monthly) *(Improve Efficiency and Effectiveness)*

VII. Pacific Islands

Grant Management (Qtr 4) *(Core Mission, Enhance Shared Accountability)*

- Award three consolidated grants totaling \$8M and two DERA grants totaling \$160,000, and provide technical support to the Pacific islands of American Samoa, CNMI, and Guam to build environmental protection programs. Conduct on-site mid-year and end-of-year performance reviews, and complete end-of-year reports for each territory. (Sept)
- Track ongoing implementation of multiple OIG recommendations to improve grants management in CNMI and Guam. Track Guam EPA's compliance with 14 high-risk grant conditions, review program income status, document allowable costs associated with program income, and, if necessary, recover unallowable costs. (Sept)

Technical Assistance and Capacity Building *(Core Mission, Enhance Shared Accountability, Increase Transparency and Public Participation)*

- Coordinate peer-to-peer capacity building among Pacific island agencies and EPA program offices in drinking water, pesticides, air, and hazardous waste, including:
 - Basic Inspector and Enforcement training in Guam and CNMI (Oct);
 - On-site program training from EPA inspectors in all territories (ongoing);
 - Technical assistance to improve SDWIS reporting performance in Guam (FY18);
 - Technical assistance on DERA-funded project to complete transition from costly imported diesel to renewable energy on outer islands in American Samoa (FY18);
 - Complete Targeted Brownfields Assessment at site of proposed five-star resort in American Samoa (March).
- In Guam, coordinate implementation of new, comprehensive environmental information system, using an EPA-managed contractor, to improve service to the public and internal efficiency, and save GEPA and the private sector several million dollars in avoided costs. (Sept)
- In CNMI, use a \$155,000 FEMA-funded contract to help the CNMI develop a long-term plan which integrates environmental infrastructure needs with \$8B worth of planned foreign-owned resorts and casinos. (Sept)
- Facilitate and host the Pacific Islands Environment Directors' Meeting in San Francisco to advance technical assistance and other strategic goals. (June)
- In coordination with SFD, conduct EPCRA Tier II inspections on all islands to identify potential sources of releases during emergencies (June). Support SFD as necessary during natural disasters. (Sept)

- Co-chair bi-national team overseeing the US Army facility at Kwajalein Atoll, Marshall Islands; update environmental standards governing facility operations; coordinate bi-annual public meetings in Majuro and Ebeye. (Sept)

VIII. U.S.-Mexico Border

- Administer Border 2020 Program and cooperative agreements with BECC, approving workplans for a total of 13 projects with an EPA contribution of nearly \$850,000. (Jan) *(Improve Air Quality, Revitalize Land and Prevent Contamination)*
- Convene regional workgroup meetings in Arizona-Sonora and California-Baja California to ensure joint-accountability among federal and state Border 2020 partners. (May) *(Enhance Shared Accountability)*
- Actively participate on the CA-Mexico Border Relations Council. (Jan, July) *(Enhance Shared Accountability)*
- Distribute, with OITA and Region 6, new border-wide US-Mexico Border Program tri-fold publication to engage key stakeholders and the public. (Oct) *(Increase Transparency and Public Participation)*
- Through a cooperative agreement with BECC, begin a project with the University of Arizona to improve local and tribal capacity to monitor *Aedes aegypti* mosquitos and implement integrated pest management. (Jan) *(Enhance Shared Accountability)*

Materials and Waste Management; Environmental Health *(Revitalize Land and Prevent Contamination)*

- Through cooperative agreement with BECC, begin five projects with state and local stakeholders; Fundación Hélice, Wildcoast, Southwest Wetlands Interpretive Association, University of Arizona, and Sonora's Commission for Ecology and Sustainable Development, to improve waste management and reduce transboundary impacts to the US. (Jan)
- In collaboration with the California-Mexico Border Relations Council, conduct a workshop to manage e-waste, scrap tires, and other materials contributing to transboundary land contamination. (Dec)
- Complete annual update of Border hazardous waste treatment, storage and disposal facilities, including electronic and spent lead acid battery recyclers, through the Binational Consultative Mechanism between EPA and SEMARNAT. (Jan)

IX. Workforce Priorities and Communications

Resources and Records Management *(Improve Efficiency and Effectiveness)*

- Continue to strategically fill critical vacancies and promotions as warranted.
- Utilize FTE, STAG, EPM, travel, training, and other allocations fully; direct resources to high-priority efforts when possible and necessary; fund travel to support staff engagement with states, tribes, and stakeholders.
- Begin close out of REPA V and initiate new REPA VI contract task orders. (June)
- Onboard contractor personnel for FOIA/Records Management task order. (Aug)
- Ensure records are properly maintained, accessible, and adhere to records schedules; evaluate options for switching from R9 to national database. (FY18)

- Coordinate timely and efficient responses to approximately 400 LND FOIA requests per year. *(Increase Transparency and Public Participation)*

External and Internal Communication *(Improve Efficiency and Effectiveness)*

- With the Office of Public Affairs, promote LND public outreach focusing on tangible results and regional priorities through media and awards events, press releases and social media. (ongoing) *(Increase Transparency and Public Participation)*
- Hold at least quarterly division meetings and office-wide activities for staff to exchange information, network, and socialize.
- Maintain LND SharePoint site as resource for events, deadlines, training opportunities, administrative information, reporting, and planning.
- Track Employee Viewpoint Survey results and efforts; address LND-specific concerns.

Training and Workforce Development *(Improve Efficiency and Effectiveness)*

- Continue strong investment in Special Emphasis programs by supporting division staff in multiple SEPM positions.
- Organize new employee lunches with the Division Director, the management team, and meet-and-greets with all employees.
- Maintain employee health and safety through floor warden training and exercises.
- Through COOP updates and exercises, maintain ability to function during emergencies.

[WTR DOP here]

FY2018 Superfund Division Operating Plan

September 14, 2017

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I. Executive Summary

The Superfund Division's primary goals are 1) clean up contaminated sites, protecting human health and ecosystems, restoring these sites to their full potential, and 2) prevent, plan for, and respond to releases. From high profile NPL cleanups and seasonal natural disaster responses to everyday community involvement and planned risk management inspections, our staff are working to prevent contamination, clean up hazardous waste, and prepare and respond to emergencies. Our planned FY18 accomplishments support five sub-objectives from the 2018-2022 EPA Strategic Plan Framework:

- Revitalize Land and Prevent Contamination;
- Enhancing Shared Accountability;
- Increasing Transparency and Public Participation;
- Compliance with the Law; and
- Improving Efficiency and Effectiveness.

Add 3-4 accomplishments to highlight and connect to subobjective.

Our work to investigate lead contamination in soils in West Oakland, and our vapor intrusion work in multiple communities and sites will progress the revitalization of these communities and prevent further contamination.

Enforcement example for Compliance with CERCLA.

II. Revitalize Land and Prevent Contamination

Our removal and remedial cleanup work ensures communities are protected from direct exposure to contaminants, have safe drinking water, and are informed and involved through the entire cleanup process. We work with communities and stakeholders to plan and implement activities that promote redevelopment and economic growth at our private, federal facility, and Brownfields sites. Our work protects communities and prevents exposure to heavy metals contamination, hazardous vapor intrusion, radiation, and protects precious water resources. Planned accomplishments for FY18 in this top-priority area include completing 30 Removal Actions, completing 11 Remedial Action Projects, finalizing 10 Records of Decision, and completing 10 Brownfields cleanups.

The following FY18 actions in our Removal, Remedial, Site Assessment, and Brownfields Programs support Objective 1.3 "Revitalize Land and Prevent Contamination" of EPA's FY2018-2022 Strategic Plan Framework.

- **Vapor Intrusion Investigations:** Complete four of the 23 planned or ongoing vapor intrusion investigations on private and federal facility sites in FY18.
- **Aerojet:** Oversee vapor intrusion investigations at more than 150 buildings on the Aerojet facility and in the neighboring community. To date, thirteen on-site areas have been identified with TCE levels requiring immediate mitigation. A long-term management plan for VI at the site will ensure site workers are protected and mitigation measures are working.
- **San Gabriel Valley, Area 1:** Continue addressing elevated PCE vapor intrusion levels around Hytone Cleaners and other source areas through source control and mitigation measures. A vapor intrusion Remedial Investigation/Feasibility Study (RI/FS) and Record of Decision (ROD) will allow for additional vapor intrusion investigations and expedited response, when necessary, across the South El Monte OU.

- **Triple Site:** Continue vapor intrusion outreach and sampling at homes, and develop long-term monitoring plans. Mitigation systems have been installed at 21 of the 275 buildings that have been sampled to date.
- **Preventing Lead Exposure and Contamination:** Evaluate soil lead contamination in West Oakland, including a Site Inspection and pilot urban metals background study. We will Inform the national policy discussion on protective lead screening and cleanup levels, including bioavailability data. We will begin an EPA regional task force that will collaborate with state and local agencies to understand and address risk factors outside of CERCLA regulatory authority.
- **Bercovich Smelter:** Conduct a small removal action to remove legacy lead contamination from historical smelter operations in residential yards, in an under-served neighborhood in Oakland, CA.
- **AMCO – West Oakland:** Complete thermal treatment of the source area which eliminates the vapor intrusion risk to on-property commercial tenants and residents living in homes near the former plant property in this environmental justice community. We will also continue the operation of the source area treatment which removed 20,000 pounds of contamination in FY17.
- **Motorola 52nd Street:** Oversee the OU2-wide vapor intrusion investigation. Indoor air sampling is planned where soil gas data indicates there are residential, school, and hospital areas with the potential for vapor intrusion.
- **Iron King Mine:** Complete the Feasibility Study for the source facilities, drainages, and 1900s-era dam which are attributed to the high levels of lead and arsenic on the site.
- **Argonaut Mine:** Work closely with DTSC to coordinate activities between the Dam retrofit project and the NPL site RI/FS to address soil and surface water contamination that poses a direct exposure threat.
- **New Idria Mine Site:** Plan and issue Administrative Order on Consent with the potentially responsible party which will result in the initiation of a Remedial Investigation and Feasibility Study to address legacy mercury contamination.
- **Sulphur Bank Mercury Mine Site:** Continue tribal-specific human health risk assessments in adjacent tribal communities to determine the appropriate cleanup level that will be fully protective. Upon completion, we will draft a Proposed Plan for the mine property operable unit.
- **Addressing Emerging Contaminants:** Sample untreated groundwater and treated drinking water for PFOA and PFOS at eight private NPL sites in California and Arizona where groundwater treated by the remedy is served as drinking water to over 1.5 million households. The sampling will determine whether these contaminants are present and pose a direct exposure threat via the drinking water on these sites.
- **United Heckathorn:** Complete a Focused Feasibility Study and the Proposed Plan to evaluate cleanup options for the site and propose EPA's preferred cleanup alternative. This work is the culmination of years of investigation and sampling events.
- **E.D. Coat Facility:** Conduct a large-scale removal action if the property owner declines to address the threat to human health and the environment due to the electroplating hazardous waste at the facility in West Oakland.
- **San Carlos Apache Drum Roundup:** Remove a large number of steel drums, linked to legacy herbicide spraying operations identified on the San Carlos Apache reservation in San Carlos, AZ.
- **Eureka Smelters:** Continue the large-scale, residential lead and arsenic-contaminated soil removal actions at the Eureka Smelters Site in Eureka, NV.

- **Lake of the Woods Radium Site:** Conduct a small removal action to address threats from radioactive wastes at this site in Kern County, CA.
- **Doeskin Road Abandoned Chemicals:** Conduct a removal action to address threats from hazardous chemical wastes at this site in San Bernardino County, CA.
- **Tuba City Dump Site:** Complete and sign a Record of Decision for the Tuba City Dump Site.
- **Northeast Churchrock mine:** Complete the Remedial Design for the final remedy at the Northeast Churchrock mine site, estimated to cost \$44.3M. Initiate a Groundwater study
- **Quivira Mine Site:** Complete EE/CAs for the Quivira Mine Site, Mac and Black Jack Mine Sites, Ruby #2 Mine Site, and the Mariano Lake Mine Site.
- **Contaminated Structures Removal Actions:** Continue our work addressing human health risk at residential and ceremonial structures and residential yards on the Navajo Nation, that are contaminated with radium from legacy uranium mining.
- **Navajo Abandoned Uranium Mines Site Investigations:** Site Investigations of AUMs on Navajo land that are slated for completion in 2018 include the 46 priority mine sites identified as posing the greatest risk, the 34 Tronox mine sites within Region 9, and the 32 mine sites Under the Freeport-McMoran settlement.
- **Western Agency Enforcement Actions:** Complete two enforcement actions in Western Agency for removal site evaluations.
- **Haystack Mine Site:** Enter an enforcement agreement to complete an EE/CA for this site.
- **Brownfields:** Work with other federal agencies, state and local government and private partners to improve communities' quality of life through economic investment. In FY18, we will complete 10 cleanups, and 200 assessments.
- **Hunters Point Naval Shipyard:** Conclude an intensive effort with the Navy and State to evaluate any residual radiation that the Navy's contractor may have left behind as a result of blatant falsification of data by the contractor. This accelerated effort will address any areas requiring remediation so the community trust in the cleanup is restored and the land can be transferred for redevelopment.
- **McClellan Air Force Base:** Continue community redevelopment through privatization for sites included in previous decision documents. Two final decision documents are currently in development under FOSET 1 and FOSET 2.
- **Partial Deletion of Pacific Coast Pipeline Site:** EPA has determined that the soil cleanup conducted in 2013 and 2014 achieved the cleanup specified in the 2011 Record of Decision Amendment. The necessary institutional controls have been placed in the form of Land Use Covenants filed with the Ventura County Recorder's Office.
- **Partial Deletion of Aerojet Site:** Consider a partial deletion for soil media of two small (3.8 and 1.7 acres) non-contiguous parcels within Operable Unit 5, pending results of a vapor intrusion evaluation. If study shows mitigation measures are protective, EPA will ask the State of California to record a Land Use Covenant requiring mitigation systems for any occupied structure.
- **Tucson International Airport Area (TIAA):** Finalize the ROD Amendment for the groundwater plume north of Los Reales Road. The ROD Amendment will establish a cleanup value for 1,4-dioxane and will include the addition of an advanced oxidation treatment plant, which will help supply the City of Tucson with potable water.
- **NASA Jet Propulsion Lab:** Sign the Final ROD that establishes the final cleanup standard for perchlorate in groundwater and confirms that the point of use groundwater treatment for

perchlorate and VOCs at two public water supply systems should continue operating per prior interim action RODs.

- **Anaconda Copper Mine Site:** Significantly advance or complete remedial investigations and risk assessments for several operable units, including OU-1 Groundwater, OU-3 Process Area, OU-4a Evaporation Ponds, and OU-7 Wabuska Drain. Initiate and possibly complete remedial design for the OU-8 Arimetco remedy.
- **Copper Bluff Mine:** Propose this site to the National Priorities List in the Fall 2018. Acid mine drainage (AMD) that contains metals discharges directly downhill and into the Trinity River which supports a substantial fishery used by the Hoopa Valley and Yurok Tribes.
- **Stoker Chemical:** Remove the site in El Centro California from "proposed to NPL" status.
- **Pearl Harbor Naval Complex:** Sign the Harbor-wide Sediment ROD, which addresses PCB and other contaminated sediment across the 5000-acre harbor through focused dredging with enhanced natural recovery, activated carbon, and monitored natural recovery.
- **Palos Verdes Shelf:** Initiate a Focused Feasibility Study to evaluate final remedial alternatives, including capping, to go along with the effective Institutional Controls program that is already in place.

III. Enhancing Shared Accountability

As stated in the Administrator's Superfund Task Force Recommendations, making the Superfund process more efficient and promoting revitalization to gain long-term benefits for impacted communities must necessarily include building stronger strategic partnerships with key stakeholders across the Superfund process. We must deploy an assortment of partnership-building activities and engagement opportunities to increase the collaboration with, and impact of, our key stakeholders. Our oversight relationships with our federal, state, regional, and tribal partners are strengthened through joint planning, information sharing, and cleanup standards development. This strategy reduces conflict, enhances shared accountability, and results in effective and efficient oversight.

Our Brownfields Program awards Site Assessment, 128a and Multi-Site Cooperative Agreement (MSCA) grants to States and Tribes for preliminary assessments/site investigations, cleanups, and redevelopment of contaminated sites. Our staff work closely with grantees to provide technical and grants compliance assistance. In conjunction with our Region's grants management office to review grant applications, monitor and approve grant expenditures to ensure funds are utilized appropriately to meet overall grant program objectives.

The following FY18 activities support Objective 2.2 "Enhancing Shared Accountability" of EPA's Strategic Plan Framework:

- **Mine Site Contingency Planning:** Work with State Counterparts to monitor rainfall and the increased risk of overflow for all mine sites. We will develop contingency response plans that identify potential overflow scenarios and the recommended response, outreach, and communication actions.
- **Dispute Resolution:** Work with the State of California to resolve two formal disputes at Edwards Air Force Base. The resolutions will address technical impracticability decisions and the role of States in determining ARARs for toxicity-based cleanup goals.
- **Utilizing Lean Process:** Work with Arizona DEQ to implement their Lean program into our combined quarterly meetings with management and interactions with the site teams. We will also

be using a Lean process to work with Stakeholders and the Responsible Party to streamline the RI/FS submittal and review process at the Leviathan Mine NPL site.

- **Mine sites prioritization (MINESHAFT):** Continue our mining prioritization efforts with CA DTSC, USCOE, and USGS to focus Superfund removal and remedial resources. Initial efforts have identified various priority areas from 42,000 California mines. This year we will be focusing on 3 gold mine "clusters" and one mercury mine cluster. We will be evaluating these areas for remedial and removal potential along with deferral to the State or USCOE.
- **CA Prop 1 Funding:** Collaborate with our state partners at CalEPA as the state directs \$800 million in projects throughout California to support groundwater sustainability and resiliency in the face of potential natural disaster. These projects are on or near ten Superfund sites in southern California.
- **EPCRA Planning Support:** Collaborate with the State SERCs and LEPCs on a variety of hazardous chemical inventory and planning initiatives. The principal focus area will be TIER 2/emergency planning information gap analysis to help insure that first responders have response planning information on all hazards faced in their community.
- **CA Vapor Intrusion Guidance:** Continue to provide technical guidance for the CalEPA Small Building Vapor Intrusion Guidance.
- **Dispersants Use Policy:** Work with our partners in Hawaii to continue revising policies regarding the use of dispersants to combat oil spills in the Hawaiian Island marine zone. Our goal in 2018 is to complete our biological assessment as part of an Endangered Species Act Section 7 consultation by December 2018.
- **Navajo Nation EPA Capacity Building:** Fund IPA to facilitate capacity building within Navajo Nation EPA Superfund Program.

IV. Increasing Transparency and Public Participation

Our work directly impacts communities, and therefore the importance of transparency and public participation is paramount. Throughout the remedial cleanup process, public participation opportunities are provided through the solicitation for public comments on key documents, community involvement and update meetings, availability of site file records, and online site profile pages. Our community involvement teams are actively engaged in our communities ensuring awareness of any risks, ways to minimize exposure, and to address public stakeholder concerns. Our staff are required to keep meticulous site records which are made available for public review. Draft Proposed Plans and decision documents are made available for public comment before feedback is considered and incorporated into later drafts.

The following actions are FY18 highlights of how we are supporting Objective 2.3 "Transparency and Public Participation" of EPA's Strategic Plan Framework.

- **Revamped Site Profile Pages:** Train RPMs to update individual site profile pages where the public can easily access and understand the cleanup status of contaminated sites. Site file documents, decision documents, and other information will be available on the new site profile pages.
- **Superfund Records Management Training:** Provide Records Management training to ensure the site files, decision documents, and other records are accurately maintained and promptly made publicly available for review and comment as required by regulation and EPA policy.
- **Navajo Nation Community Involvement:** Continue consistent participation in regular Navajo, community, PRP, and trustee meetings. With the Community Outreach Network, we will host two

2-day community workshops on Navajo Nation to educate residents about radiation and uranium exposure, and AUM cleanup efforts. We will complete three draft Community Involvement Plans (CIP) for Tse Tah, Monument Valley, and Claim 28, and complete one CIP addendum for the Bonita Peak Mining District.

V. Compliance with the Law

Our project managers and technical experts work directly with responsible parties to ensure compliance with CERCLA, the NCP, and applicable state/local regulations. We provide regulatory and policy guidance, technical assistance, and feedback through the entire remedial process to ensure compliance with the law and protective cleanups.

Another fundamental tenet of CERCLA is that the party responsible for the contamination should pay for the cleanup. We have a successful program in our region working with our Office of Regional Counsel for enforcement and cost recovery in accordance with CERCLA. This process involves a search for responsible parties, case development, and meticulous record keeping for all cleanup-related costs to ensure the correct dollar amounts are recovered from responsible parties. These efforts have resulted in over \$20 million recovered in each of the last two fiscal years. We utilize consent decrees and other legal instruments to promote compliance and the cleanup of contaminated sites.

Our Clean Air Act 112(r) Program, promotes compliance through chemical safety and preparedness training, and Risk Management Plan inspections at chemical facilities.

The following actions in FY18 support Objective 3.1 “Compliance with the Law” of EPA’s FY2018-2022 Strategic Plan Framework.

- **San Fernando Valley, Area 1:** Complete five settlements with two parties, totaling over \$15 million of groundwater remediation work to be completed. Work on a comprehensive consent decree wrapping in another 8-15 parties, and another \$60 million of work, is expected to be substantially completed by the end of FY18.
- **Rockets, Fireworks, and Flares Settlement:** End litigation, pending Court approval, that EPA joined in 2010. The settlement would require the defendant to pay \$5.9 million to help fund the cleanup and partially reimburse EPA for investigation work at the Site. Cleanup of perchlorate and TCE contamination in soil and groundwater is underway in accordance with settlements reached in 2012 and 2013 with Emhart Industries and the Goodrich Corporation/UTC. The Consent Decree is expected to be entered in FY18.
- **Plumas Eureka Removal Site:** Recover approximately 50% of our costs from the California Department of Parks and Recreation for addressing risks from lead and arsenic contamination at the Plumas Eureka State Park in the California Gold Country.
- **Eureka Smelter Removal Site:** Pursue potentially responsible parties at the Eureka Smelter Site, Eureka, NV. The site has gone through multiple ownership changes, including foreign ownership, making this a challenging cost recovery case.
- **Commonwealth Utility Corporation, Commonwealth of the Northern Mariana Islands:** Include the Agency’s cleanup costs at the CUC site in the U.S. Coast Guard’s cost recovery referral to the Department of Justice.

- **Bercovich Smelter Site, Oakland, CA:** Pursue potentially responsible parties at this abandoned smelter site in Oakland CA, where residential properties adjacent to the smelter site are contaminated with lead.
- **Case Development:** Target significant cases for completion, including the Torrance Refinery, the national Chevron Refinery case, and multiple ammonia and chlorine sector cases.
- **Risk Management Plan Inspections:** Complete 30 Risk Management Plan Inspections in FY18 to support accidental release prevention of contaminants and compliance of Clean Air Act 112(r).
- **Chemical Safety Day Training:** Support compliance with Clean Air Act 112 (r), Accidental Release Prevention, Region 9 by partnering with Ammonia Safety Training Institute (ASTI) to deliver the Ammonia Safety Day training. This training brings first responders, industry, and regulators together to promote emergency management and to better prepare, prevent and respond to incidents at chemical facilities.

VI. Improving Efficiency and Effectiveness

The growing complexity and challenge of our Division's work highlights the need to continually improve our efficiency and effectiveness. Development opportunities equip our workforce with the knowledge, skills and training needed for success. Mentoring and networking opportunities facilitate the sharing of best practices that will increase efficiency and effectiveness. Increasing the use of collaborative tools and technology will improve performance and decrease administrative burdens. Streamlining our FOIA process, and ensuring our workforce is prepared for a new Agency procurement process are among our improvement initiatives this year.

The following actions support Objective 3.4 "Improving Efficiency and Effectiveness" of EPA's Strategic Plan Framework.

- **Remedial Cleanup Program Training:** Implement rollout of program initiatives including the SFD Study Group and monthly training opportunities focused on areas of expertise critical to the RPM position. The program builds upon the existing environment of mentorship, knowledge transfer, and collaboration within the Division.
- **Management and Leadership Training:** Develop and coordinate training opportunities for supervisors and managers focused around leadership, communication, and organizational awareness.
- **FOIA:** Identify and secure additional resources to support the Division's work in responding to FOIAs. Establish increased management support of our FOIA work.
- **Remedial Acquisition Framework (RAF):** Prepare and train staff for the Agency FY18 rollout of RAF which will drastically change how remedial contracting is conducted and managed.
- **SFD SharePoint site:** Further develop the site to increase collaboration and efficiency. The SFD Training subsite and RPM subsite will be the focus for this year's development. Key goals include a Cleanup Site Directory and Training Portfolio Tracker.

Appendix I: FY18 Key Metrics

Key Metric	FY18 Targets
Brownfields Properties Assessed	200
Brownfields Properties Cleaned Up	10
Risk Management Plan Inspections Completed	30
Removals Completed	16
Site assessments completed	80
Human Exposures Under Control Sites	0
Remedial Action Projects Complete	11
Construction Completions	2
Sites With Groundwater Migration Under Control.	0
Sites Ready for Anticipated Use Site-wide.	3
Records of Decision	10

Appendix II: FY18 Grant Award Projections

State/Entity	PA/SI	128a State Response	MSCA
Arizona		\$739,000	\$400,000
Nevada	\$125,000	\$615,000	
California	\$550,000	\$1,000,000	\$300,000
Hawaii	\$275,000	\$936,000	-
Gila River Indian Community		\$180,000	-
Hoopa Valley Tribe		\$134,000	-
Salt River Maricopa		\$175,000	-
Tohono O'odham Nation		\$153,000	-
Yurok Tribe		\$277,000	-
American Samoa		\$256,000	-
Northern Mariana Is.		\$223,000	-
Guam		\$218,000	-
White Mountain Apache Tribe		\$94,000	-
San Carlos Apache		\$48,000	-
Pyramid Lake Paiute Tribe		\$10,000	-
Twenty-nine Palms Band of Mission Indians		\$67,000	-
Elk Valley Rancheria		\$70,000	
Fort McDermitt Paiute-Shoshone		\$70,000	
Walker River Tribe		\$70,000	
Yerington Paiute Tribe		\$70,000	
Navajo Nation		\$200,000	

FY2018 Enforcement Division Operating Plan

Executive Summary

The Enforcement Division works closely with state and tribal governments to achieve compliance with our national environmental laws through civil enforcement actions and compliance assistance efforts. We work in partnership with our states and tribes that have been delegated authority to implement federal programs and directly implement both non-delegated and non-delegable programs. We target our enforcement efforts (both formal actions and compliance assistance) to achieve the broadest impact in protecting public health and the environment and to deter non-compliance.

In FY18, we will focus our enforcement and compliance assistance efforts on four key areas:

- Pursuing mobile sources of pollution by conducting monthly inspections at the Ports of LA/Long Beach for non-compliant vehicles and engines, enforcement of California's Truck and Bus rule, and actions against manufacturers and installers of defeat devices.
- Protecting drinking water by reducing the number of drinking water systems in non-compliance with the arsenic standard and other contaminants and by enforcing the 2005 ban on large capacity cesspools.
- Protecting surface and coastal waters by addressing non-compliance with stormwater, wastewater and oil tanks requirements.
- Reducing potential exposure to hazardous chemicals by addressing non-compliance with regulations regarding hazardous waste, chemical reporting, lead-based paint, and pesticides.

In our NEPA program, we will provide early engagement and review of major actions proposed by other federal agencies that would significantly affect the environment. We anticipate increased emphasis on early coordination with federal lead agencies pursuant to the Administrator's focus on streamlining infrastructure development.

We will coordinate the regional EJ activities to address environmental challenges facing EJ communities. We will manage the competitive grant program, promote the use of EJSCREEN and work closely with our states and tribes to develop strong EJ and Title VI programs.

The Enforcement Division (approximately 90 FTE on-board) works with state, tribal and territorial governments to achieve compliance with our nation's environmental laws through civil enforcement actions and compliance assistance. We work in partnership with our states and tribes that have been delegated authority to implement federal programs and directly implement federal non-delegable programs. The Enforcement Division also coordinates Environmental Justice activities bringing critical attention to communities disproportionately burdened by environmental stressors. The Division houses the Environmental Review Office, which comments on Environmental Impact Statements prepared by other federal agencies.

Some of the key environmental issues impacting our region are: LA basin and the Central Valley of California air-sheds not in attainment for ozone and PM 2.5 standards; naturally occurring arsenic impacts many small drinking water systems in CA, NV and Tribal Lands. Territories and Tribes struggle to maintain basic infrastructure systems for drinking water and wastewater. California, Nevada, Arizona and Hawaii employ over 35% of the nation's agricultural workers, and grow 50% of the nation's produce. Other important industries include electronics and technology, forestry and mining. The ports of Los Angeles, Long Beach and Oakland link the movement of goods between California and the rest of the country. Trade at the ports of LA and Long Beach comprises approximately 33% of all containerized trade in the nation. Enforcement activities are captured under the following Goals and Objectives as described in the draft FY18-22 Strategic Plan Framework.

Goal 2: Cooperative Federalism (Objective 2.2): Enhance Shared Accountability: Improve environmental protection through joint governance and compliance assistance among state, tribal, local and federal partners.

Goal 3: Rule of Law and Process (Objective 3.1): Enforce environmental laws to correct noncompliance and promote cleanup of contaminated sites.

I. Delegated Programs

All States

Drinking Water: Many of Region 9's disadvantaged communities are served by small public water systems (PWS) lacking sufficient capacity to assure consistent compliance with the Safe Drinking Water Act (SDWA). As part of Region 9's Small System Action Plan (SSAP), the Enforcement Division will work closely with our state and tribal partners to ensure that small non-compliant systems are placed under a state or federal enforcement order with an enforceable "return to compliance" schedule. We anticipate finalizing two actions against tribal facilities in FY 18. We will follow up on any additional referrals from California and conduct compliance monitoring for several systems under existing orders. Regular calls and meetings with our state and tribal counterparts to share information and track progress is an essential part of this work.

Pesticides Worker Protection Standard (WPS): In FY18, Enforcement Division and Land Division will continue implementing its Worker Safety Initiative, partnering with our states, tribes and territories to build capacity, train inspectors, and investigate and develop cases referred to Region 9. States have primacy for pesticide use and the WPS and Region 9 directly implements the program on Tribal Land. Region 9 plans to conduct 6 WPS inspections on tribal land and 4 joint WPS inspections with our states.

Information Management: Our Information Management Section provides data-related support activities (e.g. supporting data accuracy, completeness, flow, capacity building, etc.) to the Region's media program offices and to state, local, and tribal enforcement program offices. Significant workload activities for the coming year include our support to our States and dischargers as they transition to electronic reporting from paper reporting for NPDES data; and to the Land Division, our States, and the regulated community as they transition from paper manifests for hazardous waste shipments to electronic manifests. These activities include providing outreach to the states and regulated communities about these new systems, providing technical and troubleshooting support on accessing and using the systems, and supporting our states in resolving data discrepancies.

California

Delegated programs: CAA; CWA-NPDES; RCRA; FIFRA

Non-delegated: CWA 311; CWA 404

Geographic Initiatives: Cal EPA has focused compliance assistance and enforcement resources in overburdened communities through their Environmental Justice Task Force. Region 9 participates as an external steering committee member and partner on the ground in geographic initiatives, in community engagement and collaborating with state and local agencies in conducting inspections. In FY 18, Cal EPA will focus on the City of Pomona, along the border in Imperial Valley, and in Kern County, in the Central Valley. Region 9 will participate through inspections and/or compliance assistance in multiple programs, including air, pesticides, stormwater (Pomona only), and lead-based paint programs.

Clean Water Act: We will work closely with the State Water Board and 9 Regional Boards to identify and inspect industrial stormwater in areas where stormwater impacts to receiving water are evident as well as targeted wastewater discharges. We plan to inspect pretreatment industrial users with special emphasis on those that fall under the industrial discharger national enforcement initiative (see Appendix). We will also continue our negotiations with the City of San Francisco for municipal sewage discharges. Under our CWA 404 program, we are continuing to develop two significant wetland judicial cases in close coordination with state agencies and the Army Corps SF District Office. We are also developing a wetland case in Los Angeles.

RCRA: Region 9 will continue to focus enforcement efforts on process-based inspections at refineries and other complex facilities, including those subject to the national air toxics

enforcement initiative (See Appendix). California lacks the expertise to conduct these inspections at this time and we are providing training and capacity-building in these areas. We plan to complete process-based actions started in FY 17 and conduct two additional process-based inspections. If the National Enforcement Initiatives go forward, we will conduct five waste tank inspections.

Hawaii

Delegated programs: CAA; CWA-NPDES; RCRA; FIFRA

Non-delegated: CWA 311; CWA 404

Pesticides: The Hawaii Department of Agriculture (HDOA) implements the pesticides program. We will continue to negotiate and expect to settle cases that HDOA referred to us involving pesticide use and WPS violations. Based on prior years, we anticipate that HDOA will refer some pesticide use or WPS cases to EPA. Region 9 is continuing to support HDOA to build program capacity.

Clean Water Act: We manage an in-kind services contract (using program grant funds) for NPDES inspection work and are supporting HDOH in implementing an action plan to improve its enforcement program and implement an inspector training and credentialing program. We will oversee City and County of Honolulu compliance with its consent decree for wastewater treatment and collection system upgrades. We will support HDOH on stormwater issues and monitor compliance with the HDOT-Harbors and Marisco consent decrees. We expect to complete the Waimanalo judicial case this year as well. Lastly, for CWA 404, we will monitor compliance with the Administrative Order with City and County to develop a stream maintenance program and we will implement our recent CWA 404 Field Level Agreement with Honolulu Corps District to improve wetland coordination, including division of labor in addressing non-compliance.

Nevada

Delegated programs: CAA; CWA-NPDES; RCRA; FIFRA

Non-delegated: CWA-pretreatment; CWA 311; CWA 404

The number of regulated entities in Nevada is fairly small and NDEP effectively implements its enforcement program. Therefore, our resource outlay in Nevada is more limited. In FY 18, we will assist NDEP in providing compliance assistance to industrial dischargers, and continue to track compliance with the NDOT consent decree.

Arizona

Delegated programs: CAA; CWA; RCRA; FIFRA

Non-delegated: CWA 311; CWA 404

Due in part to lack of administrative penalty authority, ADEQ's enforcement program generally addresses non-compliance through informal enforcement. Pursuant to its process, if return to compliance is not achieved in a timely manner or if non-compliance is discovered subsequently, ADEQ will escalate to formal enforcement. In our review of ADEQ's program, we have found instances where multiple informal notices have been sent without escalation to formal

enforcement. We have found that historically, EPA inspections reveal significant non-compliance more often than state-led inspections. For these reasons, Region 9 will maintain an oversight presence in Arizona, by actively engaging with the State during routine grant reviews and monthly coordination calls with the state. In FY 18, we will conduct 3-4 RCRA inspections under the air toxics NEI to provide training and capacity building for ADEQ staff. We will also help ADEQ develop a sanitary sewer overflow inspection program.

II. Direct Implementation

Islands and Tribes

Most of the 148 tribal governments and the three Pacific Island territories in Region 9 lack the institutional capacity or delegated authority to enforce federal environmental laws. EJ concerns also underscore the need for an effective enforcement program in these remote areas. At the request of Guam and Saipan, staff from the Enforcement Division and Office of Regional Counsel will provide basic inspector and case development training to 60-80 island program staff in October 2017.

CWA: In the NPDES program, we are monitoring compliance with 13 legacy cases, including major infrastructure renewal cases, and will complete several additional administrative and judicial actions on tribal lands and in the Pacific Islands. Region 9 has lead responsibility for completing NPDES compliance evaluation inspections at NPDES dischargers on Tribal Lands. We will continue to monitor compliance with compliance orders we issued for wastewater treatment plants on the Navajo and White Mountain Apache and work with the Tribes to remedy the chronic violations at these facilities. Region 9 has sole responsibility for conducting compliance evaluation inspections at the NPDES dischargers on Guam, CNMI and American Samoa. We will monitor compliance with the Guam Waterworks and the Commonwealth Utilities Corporation long-term consent decrees. We will negotiate judicial settlements in cases against POTWs and industrial dischargers in American Samoa and Guam.

FIFRA: FIFRA inspection and enforcement efforts on tribal land will be focused on the new WPS. We will follow up with enforcement on producer establishment inspections conducted by the states and territories on our behalf, ensuring program integrity. We will provide training to inspectors at tribes and territories to ensure program capacity to conduct high-quality inspections.

Non-Delegable Programs

CWA Pretreatment in Nevada: We will conduct five Pretreatment Compliance Inspections at the POTW pretreatment programs in the Las Vegas and Reno metropolitan areas and pursue enforcement as needed.

SDWA: Cesspools in Hawaii: EPA banned large capacity cesspools (LCCs) in 2005 yet many LCCs

are still in use in Hawaii. Region 9 is using a combination of compliance assistance and direct enforcement to address LCCs. We have successfully taken actions against federal, state, and privately owned and operated LCCs. We will continue to focus on those facilities and in FY18 we will inspect approximately 35 facilities.

SPCC: As part of our multi-year strategy to implement the Oil Program, in FY18, we will perform Spill Prevention, Control and Countermeasure (SPCC) inspections and Facility Response Plan inspections and drills throughout the region, provide compliance assistance to the regulated community and stakeholders, and provide training to inspectors from partner agencies. We will develop and hopefully make significant progress to settle three large judicial spill cases, one of them is actively being litigated.

TSCA: Lead-Based Paint: Lead-based paint in older housing contributes to elevated blood lead levels and lead poisoning in young children. Over the past three years Region 9 has been expanding our efforts to enforce TSCA lead-based paint regulations. We have added staff to the program and cross-trained existing staff, and this year we will inspect at least 80 companies for compliance with the Renovation, Repair and Painting and disclosure rules. We recently concluded 39 TSCA lead-based paint administrative enforcement actions and as a result of these new investments, we expect to conclude at least 15 enforcement actions during FY 2018.

TSCA: Core: Companies that domestically manufacture or import chemicals are required to report these activities to EPA. Region 9 has the third largest universe of manufacturers or importers subject to these requirements. Recent field investigations reveal that non-compliance in this sector may be significant. We are cross-training additional staff to support field inspections, enforcement and compliance assistance in this program.

Imports/Exports: With three major ports (Los Angeles, Long Beach and Oakland) and an international border with Mexico (in California and Arizona), illegal imports of vehicles and engines, pesticides, and chemicals are a significant environmental threat. Targeting imports for inspection provides an opportunity to address goods before they enter U.S. commerce and cause significant impacts. We are partnering with U.S. Customs and Border Protection (CBP) and will conduct at least monthly inspections at the Ports of Long Beach and Los Angeles. We inspect 8 to 15 shipments bimonthly in the Port of Los Angeles/ Long Beach under the CAA mobile source enforcement program. In recent years, the team sent over 100 seizure recommendations to CBP and reached agreement on settlements, mostly Expedited Settlement Agreements (ESAs), with 33 companies for importing uncertified engines or engines with illegal catalysts. This encompasses more than 12,000 illegal vehicles and prevented emissions of over 15 million pounds. Each company paid a civil penalty and, in most cases, exported the engines. We sent 10 pesticide import denial recommendations to CBP and reached agreement on 3 penalty settlements, mostly for unregistered or misbranded pesticides. Our Los Angeles staff support this regional priority. In FY18, we plan to increase our investment in our pesticides imports program by cross-training other import inspectors on pesticides imports, performing more intensive reviews of pesticide imports, and improving our targeting to focus our efforts on the most likely noncompliant imports and importers.

Mobile Sources: Communities in the San Joaquin Valley and the Los Angeles basin are exposed to the worst air quality in the country, with both areas in nonattainment for PM2.5 and ozone. Approximately 80% of the air pollution in California's ozone nonattainment areas comes from mobile sources. The California Air Resources Board adopted rules related to truck and bus fleets operating in California (Truck and Bus Rules) which have been incorporated into the State Implementation Plan. In 2013, CARB requested that EPA pursue national trucking fleets operating in California that are violating the Truck and Bus Rule as it is more difficult for the State to pursue these national fleets. We have 2 active cases involving large national trucking companies and expect to initiate 10 additional cases in FY 18. We will also work with the US Coast Guard to support OECA in developing a program to enforce the requirements of Annex 6 of the MARPOL Treaty (low-sulfur fuel requirements for ships within 200 miles of the U.S. coastline known as the Sulfur Emission Control Area). We also will address after-market engine defeat devices, which are easily obtained and generate thousands of pounds of uncontrolled air emissions. In FY18, we plan to settle existing cases against *Yoshimura* and *Two Brothers Racing*. We're also developing 12-15 cases against manufacturers, distributors and installers through on-site inspections and CAA section 208 Information Requests. We currently have one complex judicial case in settlement negotiations with DOJ, and referred a significant case at the end of last year.

III. Compliance Assistance

We are more fully integrating compliance assistance into our programs. We have convened two division-wide meetings focusing on options to achieve compliance assurance using all tools. We have developed a SharePoint site of previous compliance assistance materials and guidance documents so we can determine which materials are still relevant. Our goal is to develop media, sector and geographic-based efforts in collaboration with the appropriate media divisions that will range from updating materials, to inspection-specific compliance assistance, to direct sector outreach. We are in early discussions with DOD about conducting a regional training conference in 2018.

IV. National Environmental Policy Act

EPA has a statutory mandate to review and comment in writing on major actions proposed by other federal agencies that would significantly affect the environment. Pursuant to the National Environmental Policy Act (NEPA), such projects are submitted to EPA and the public for review as Environmental Impact Statements (EIS). Due to the large amount of federal land, natural resources, military bases, tribal lands, and infrastructure and housing development activity in the Pacific Southwest, Region 9 has the largest EIS review workload of all regions, consistently receiving approximately 25% of the EISs submitted to EPA nationwide, or 70-140 EISs per year for our review. Major sectors represented by NEPA projects in Region 9 include transportation; hardrock mining; utility-scale renewable energy; water management; forest restoration and fire recovery, and housing/mixed-use, military, and tribal development. In FY18, we anticipate increased emphasis on early coordination with federal lead and cooperating agencies, pursuant to the Administration's focus on streamlining infrastructure

development and environmental review processes. Our goal is to assist federal lead agencies in (1) minimizing the adverse environmental impacts of their actions, and (2) meeting their obligation under NEPA to engage in informed decision making and public disclosure of the environmental impacts of proposed federal actions in a timely manner.

V. Environmental Justice

The Enforcement Division is responsible for EJ coordination throughout the Region and managing the competitive EJ grants program. We will support the integration of EJ in the Region's permitting and enforcement work; partner with other federal, state, local, and tribal agencies and focus on a handful of the most substantive environmental challenges facing EJ communities in Region 9. We will provide support to states, tribes and EPA programs in the use of EJSCREEN to help focus our community-based efforts, respond to community complaints and work closely with our state agencies to assist them in developing EJ training and strong Title VI programs. We will use EJSCREEN as a tool for prioritizing enforcement efforts.

VI. Key Trends

We have redirected resources to those programs where human health is most directly affected: mobile-air sources, worker protection under FIFRA, small drinking water systems, and prevention of lead-based paint exposure. Region 9 has increased our level of engagement with California's senior enforcement leadership. In an effort to provide guidance and strategic leadership, we are actively involved with the Certified Unified Program Agency (CUPA) Forum Board, the leadership group for the 81 California CUPAs. With CalEPA, we will continue to serve as convener of stature in certain complex situations where multiple agencies may need to collaborate to achieve an appropriate response.

In FY18, our management team will focus on the following: 1) collaborating with states and tribes to ensure compliance; 2) implementing the Field Operating Guidelines (FOG); 3) implementing the inspection report process established through a FY15 LEAN event; 4) effectively using contract funds and NEIC resources for inspections and case development support where the region lacks resources or expertise; 5) formulating and implementing an effective compliance assistance program; 6) using innovative technology in field work; 7) improving our targeting and management tools; 8) coordinating pipeline management with ORC and CID; and 9) fully integrating environmental justice throughout the Enforcement Division while also overseeing the Region's internal EJ Network and monitoring the Region's commitments in support of EJ. We have established several best management practices including development of an inspection/case tracker database and a protocol for case screening before moving forward with case development.

In the past two years, the Enforcement Division lost a total of 11 people (approximately 10% of our staff) due to retirement, reassignment, voluntary separation and the most recent VERA/VSIP. We anticipate changes to our FY18 budget and will work toward implementing our highest priority programs with the new budget.

The Division has a good mix of seasoned and new inspectors; however, we expect continued

loss of experienced staff in the next few years. To support critical programs, we are cross-training inspectors in Core TSCA as well as FIFRA. We have created a Title V supervisory position to effectively manage our FIFRA program and provide program assistance to the inspectors.

Region 9 has an inspector in our Honolulu office, who is credentialed to conduct drinking water, pesticides and Underground Injection Control (UIC) inspections and is available to conduct enforcement-related work in Hawaii and other Pacific Islands. We have 3 enforcement staff located in Los Angeles who focus on pesticides, stormwater, and mobile source issues. Region 9 saves a significant amount of travel funds by using these employees for enforcement work.

Travel funds are essential for regional enforcement personnel to do their work and to establish needed field presence, particularly in Region 9 as our enforcement footprint includes distant Pacific Islands and territories.

Appendix – National Enforcement Initiatives

For the past several years, the national enforcement program has designated certain activities as National Enforcement Initiatives (NEIs). National Enforcement Initiatives (NEIs) are selected every three years to focus resources on national environmental problems where there is significant non-compliance with laws, and where federal enforcement efforts can make a difference. In 2015, EPA designated the current NEI cycle. It is unclear whether the current administration will elect to continue the NEI program.

Keeping Industrial Pollutants Out of our Nation's Waters. (New) This NEI focuses on industrial discharges from the following sectors: chemical manufacturing, primary metals manufacturing, mining and food processing. As appropriate, we will develop cases from inspections of food processing facilities in Arizona and the Pacific Islands and evaluate the universe of pretreatment industrial user facilities in all of the NEI sectors.

Reducing Risks of Accidental Releases at Industrial and Chemical Facilities. (New) The chemical accidental release program, also generally known as CAA 112r program is implemented by the Superfund Division.

Keeping Raw Sewage and Contaminated Stormwater out of our Nation's Waters. We have addressed all of the major wastewater systems subject to EPA's NEI for sanitary sewer overflows (SSO). We will devote resources to monitor major infrastructure consent decrees. We developed a CSO referral for San Francisco Public Utilities Commission for violations of its permit and are in negotiations with it. We are in negotiations in a second case with Guam Waterworks Authority for treatment plant and SSO violations. We are working with California to conduct SSO inspections at medium and small systems. The Municipal Separate Storm Sewer System (MS4) portion of this NEI was a high priority and workload from FY11 through FY17. We evaluated nearly all of the 35 Phase I permits in our Region, but in FY17 decided to divest in this area given the large resource commitment the program reviews demanded. In FY18, we will focus on industrial sources in metropolitan areas predominately in California.

Cutting Toxic Air Pollution that Affects Communities' Health. The Air Toxics NEI investigates product and waste tanks. We will look for opportunities to provide compliance assistance to regulated sectors. We will conduct 6 in-depth RCRA inspections at chemical manufacturing and Treatment, Storage and Disposal (TSD) facilities in the RCRA NEI universe. Under the CAA, we are currently investigating one facility and will conduct two investigations of additional facilities.

Reducing Widespread Air Pollution from the Largest Sources, Especially Coal-fired Utility, Cement, Glass, and Acid Sector. Region 9 has initiated all of our investigations under this NEI. We'll focus on completing existing cases in the pipeline.

Energy Extraction. This NEI focuses on non-compliance associated with the extraction and production of natural gas. Region 9 conducted a number of inspections in this sector in the past, did not find significant non-compliance, and thus we do not plan to invest in this area.

Concentrated Animal Feeding Operations (CAFOs) CAFOs are a subset of livestock and poultry animal feeding operations that meet the regulatory thresholds of number of animals for various animal types. The majority of Region 9 CAFOs are in California, where the Regional Water Quality Control Boards maintain effective enforcement programs.

**Environmental Management Division
FY 2018 Operating Plan (REVISED DRAFT)**

October 13, 2017

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I. Executive Summary

The Environmental Management Division provides day-to-day operational support to the Region in the areas of budgeting, financial management, acquisition management, grants management, human resources, Equal Employment Opportunity and diversity programs, health and safety, facilities, information technology, and science policy. Our goal is to deliver exceptional customer service in support of the environmental and public health mission of EPA Region 9. In this plan, we lay out how we support continuous improvement, operational efficiency, and cost-savings. The four key actions from this DOP that we would like to emphasize are: (1) our Lean Six Sigma program and FY 18 Lean activities, (2) the workspace utilization efforts that we hope will achieve space and cost savings, (3) modernization of our information technology infrastructure, and (4) implementation of our consolidated IT support contract which will also save resources.

FY 2018 – 2022 Draft Strategic Framework Objective

Improve Efficiency and Effectiveness: Provide proper leadership and internal operations management to ensure that the Agency is fulfilling its mission.

II. Improving Efficiency and Cost-Effectiveness

Objective 3.4 – Lean Principles

A. Lean Activities

Region 9 is a leader in preparing the workforce to embrace and carry out the fundamental principles of Lean Six Sigma and continuous improvement. Since January 2016, we have trained over 90 employees throughout EPA and have certified 8% of the Region's workforce as Lean Belts under our formal Lean Training program. In FY18, we will focus on implementing a Lean Management System in EMD. We will continue to train lean professionals, sponsor critical lean projects of improvement, and transform business activities throughout the region. The following are our Lean activities for FY18:

1. ***Training:*** Train and certify an additional 3% (10 black belts and 15 yellow belts) of Region 9's workforce in Yellow, Green, and Black belts in FY 2018. Solicit and initiate new Lean projects.
2. ***Complete and implement three projects:***
 - ***Improve Exit (off-boarding) Process – FY 2017 Lean Project***
Implement at least 50% of recommendations from 2017 Lean project to streamline the employee exit process. Eliminate all remaining paper forms and automate the Exit Process by end of Fiscal Year 2018.
 - ***Improve Budget Planning Process for Regional Support Account (RSA) Budget***
Implement RSA lean project recommendations to improve the budget planning process to make it a consistent and efficient process from budget development to implementation to final RSA budget.
 - ***Evaluate Quality Assurance Document Review Process***
The Quality Assurance Section will examine its process and SOPs for opportunities to streamline tasks and reduce review/approval times of documents by 20%.
3. ***EMD Lean Management System:*** Sustain and integrate Lean results into the everyday operations of our four branches. Implement Lean visual management supported by the EPA Chief of Operations by displaying flow-boards and performance-boards for EMD branches.
4. ***R9 Projects:*** Continue to identify and assign belts to conduct new Lean projects in accordance with EPA Chief of Operations' Lean Management approach. Ensure full implementation of existing projects and track results.

B. FY18 Process Efficiencies

1. Improve Property Management Accountability Process

Evaluate current IT hardware and software asset tracking process and systems and identify improvements for streamlining the process and data entry into one system of record by January 2018.

2. Optimize Utilization of Leased Space

Continue efforts to reduce the footprint at the Regional office and realize cost savings/cost avoidance.

- Reduce leased footprint at 75 Hawthorne by 5 percent by end of FY18 Q1.
- Redeploy unused furniture and equipment from the San Francisco Regional Office to the renovated Los Angeles Office Signal Hill Offices in FY18 Q2 in lieu of purchasing new FF&E.
- Partner with GSA and OARM to finalize the Program of Requirements (POR) and Solicitation for Offers (SFO) documents for the new Field Support Service Center. When completed in 2022, this facility will reduce leased space by 66% from operations currently housed at the Richmond Laboratory and San Francisco Emergency Response Facility.
- Move the Southern California Field Office and CID into renovated space resulting in leased space savings of 19% from existing lease.
- Continue collaboration with GSA to finalize construction drawings for the new San Diego Border Office location at the Schwartz Federal Building. Occupancy is slated for summer 2020.

3. Improve Timeliness of Awarding Grants

Obligate 35% of FY18 STAG, CEP, and SRF grant dollars by June 30, 2018, totaling 50% of all grant actions for the fiscal year, given a timely budget. Spreading grant awards throughout the fiscal year enhances the efficient use of grants management FTE.

4. Improve Process for Pre-Award Reviews

Reduce the type and number of pre-award reviews that senior grants specialists must perform prior to award for junior grants specialists by 20% by first quarter of FY 2018. Senior grants specialists will no longer review low risk, less complex award actions (such as incremental funding and amendments) processed by junior grants specialists prior to Grants Management Officer (GMO) review and award.

5. Implement Regional IT Support Services Contract (RITSS - \$45M)

Develop and provide task order implementation guidance and competition procedures to all regions issuing task orders under the contract by November 2018. This combined regional contract is expected to be used by most regions and is expected to save an estimated \$750,000 over the 5-year term of the contract for Region 9, alone, plus additional savings as other regions on-board. Apply lessons learned from this award to other contractual services used by other Regions.

6. Issue Superfund Technical Assistance and Response Team Contract (START - \$85M) for Regions 7 and 9

Develop solicitation, issue request for proposals, conduct technical evaluations, conduct price negotiations and issue contract award by September 30, 2018. The cooperative regional process for this and the Emergency Response Services Contract (ERS) contract (being developed by Region 7 for both regions) will save approximately 1 FTE of contracting resources in each region during the award phase.

7. Evaluate In-Kind Services Contracting

The Contracts Management Section spends approximately one FTE each year performing in-kind services contracting for California, Hawaii and the Pacific Territories. We will evaluate the effectiveness of EPA continuing to perform this work for the states and territories.

III. Workforce Planning and Development

Objective 3.4 – Workforce Planning

A. Workforce Planning

EMD will complete our workforce planning project for the IT and QA sections and will develop a workforce plan for the remaining sections in the division. The plan will identify competencies, skills, a strategy to fill skill gaps, appropriate supervisory ratios, recruitment strategy, a succession plan, and a workload analysis. All recommendations from the Workforce Planning effort of FY 2017 will be implemented by end of second quarter. EMD will create a workforce planning model for R9 divisions and support one other division in undertaking its workforce planning effort.

IV. Information Systems Modernization

Objective 3.4 – Modernize Information Systems for Improved Collaboration

1. Improve Reporting of Financial Data through automation

The Financial Management Branch will continue to provide timely, accurate, useful, budget and financial reports and data for the region. FMB will establish a schedule for reporting activities (data cutoff dates, division/office due dates, etc.) and move away from customized reports to reports generated by the Agency's financial systems.

2. SCORPIOS Enhancement

With the elimination of Lotus Notes, the Accounting Office will develop a temporary tool to track Superfund cost recovery package by November 2017 in FY18. There will be a national effort for a SCORPIOS enhancement in FY 2019.

3. Next Generation Grants System (NGGS)

OGD is replacing the Integrated Grants Management System (IGMS) with NGGS in January 2018. Regional grants specialists, project officers, and approving and awarding officials must complete training by the second quarter of FY18. This activity should be included in the DOP of each R9 Division that manages grants (or standards as applicable).

4. Enterprise Quality System Pilot Testing

The Enterprise Quality Management Division (in OEI) has purchased a new system that will accept documents from the entire EPA QA community. This system will replace the QA Section's Lotus Notes database. Region 9 will pilot the system in the second quarter of FY18.

5. Modernize the Region's Information Technology Infrastructure

EMD will invest in and deploy new hardware and software to improve our customer's experience and improve data sharing with internal and external partners.

- Replace remainder of obsolete multi-function printer devices by March 2018.
- Complete FY18 20% annual refresh of computers by March 2018.
- Complete migration to Windows 10 operating system by December 31, 2017.

6. Implement OEI's Customer Help Tracking System

We will partner with OEI to serve as the Regional pilot site for implementation of the Agency's new IT help ticket tracking system, with implementation by December 2017. In addition, we plan to implement the following other system modules:

- Implement Facilities help ticket tracking module by January 2018.
- Implement Division Project Management Tracking module by November 2017.

7. Complete Lotus Notes Application Migration

OEI has established December 30, 2017, as the date that remaining Lotus Notes applications must be migrated to new platforms. We will partner with Divisions to ensure that all applications are migrated by FY18 Q1.

V. Strategic Approach to State Oversight

A. Laboratory Audits and Certifications

The Region 9 Lab operates the Regional Drinking Water Laboratory Certification Program to assess state, tribal and territory drinking water laboratories, and provide oversight of state and territory drinking water laboratory certification programs. Laboratory assessments are performed triennially and program oversight assessments annually. In FY18, we will conduct 10 laboratory audits and 4 program overviews.

B. Quality Assurance

1. **Air District Technical System Reviews:** We will collaborate with the Air Quality Analysis Office on Technical System Audits of ADEQ, CARB, Clark County, BAAQMD, Gila River and Pechanga.
2. **QAPP Templates for UST and Drinking Water:** We will complete the QA Program Plan (QAPP) template for the Underground Storage Tank program and develop a template for the Drinking Water program, to reduce the time for organizations to develop QAPPs that include all the information necessary.
3. **Quality System Reviews:** We will complete a review of the CA State Water Resources Control Board and initiate a review of the Arizona Department of Environmental Quality.
4. **Training:** We will conduct a QA workshop during the EPA-Tribal Annual Conference and an Air QA training at the Air and Waste Management Association meeting.

VI. Grants Management and Fiscal Areas

1. Improve Administrative Oversight and Accountability

Implement a Grants Internal Controls plan to increase administrative oversight and accountability by the second quarter of FY18.

- Appoint an auditor in the Grants Management Section to implement the Grants Internal Controls Plan.
- Conduct trend analyses on non-compliant recipients to determine recurring findings and conditions, create a system to monitor and track all open grant audits and other non-compliance issues, and to work directly with recipients to resolve outstanding corrective actions and train them on proper procedures.

2. Award Grants

Award approximately 700 grants with a value of \$450M to assist states, tribes, territories, and local governments in implementing federal environmental programs and building water and wastewater infrastructure and to support agency implementation of *Draft FY 2018-2022 EPA Strategic Plan Framework Goals 1 and 2*, by September 30, 2018.

3. Award Contracts

Award roughly 900 contract actions with a value of approximately \$70 million to support agency implementation of *Draft FY 2018-2022 EPA Strategic Plan Framework Goal 1, Objectives 1.1, 1.2, and 1.3* by September 30, 2018.

4. Budget Execution

Utilize at least 95% of the region's payroll and FTE allocation. Monitor and provide monthly status reports on training and travel utilization. Monitor division use of expiring funds with the goal of using all expiring funds by fiscal year end to support agency implementation of *Draft FY 2018-2022 EPA Strategic Plan Framework Goal 3, Objective 3.4* by September 30, 2018.

5. Provide Financial Reports

Design and deliver to various internal customers roughly 7,020 financial reports (27 per day, 5 days a week), in addition to the monthly SMT metrics reports, annually to the regional resource community to support agency implementation of *Draft FY 2018-2022 EPA Strategic Plan Framework* Goal 3, Objective 3.4 by September 30, 2018.

6. Superfund Cost Recovery Packages

Complete 70 to 80 Superfund cost recovery packages in the fiscal year. This is in addition to about 80 GAO/OIG audits and audits required under the Single Audit Act during the year.

VII. Priority Focus Areas

1. Emergency Preparedness

Develop the R9 2018 COOP and Emergency Planning, Testing, Training and Exercise (TT&E) Calendar by November 2017.

2. Customer Service

Continue building a culture of customer service based on EMD's customer service principles and provide in-person training to employees in first quarter FY18.

3. EEO

Conduct partial Barrier Analysis and provide recommendations towards being a model civil rights organization. Support Special Emphasis Program efforts towards improving the cultural competency of the workforce and their ability to effectively engage with the communities that we serve.

4. Vapor Intrusion Study (RARE)

ORD awarded us a Regional Applied Research Effort (RARE) grant to develop guidance on uncharacterized indirect vapor intrusion (VI) migration routes into commercial and residential buildings. QA Section staff will lead the technical work on this project, including overseeing the evaluation and investigation of the sampling methods and procedures to be used in this study and reviewing project data and documents. The two-year \$100,000 study will focus on Superfund and Brownfields contaminants of concern. This comprehensive work will inform VI mitigation decisions at sites in Region 9 and across the nation.

R9 OFFICE OF PUBLIC AFFAIRS

OPERATING PLAN- FY18 (DRAFT)

EXECUTIVE SUMMARY

In fiscal year 2018 (FY18), the Office of Public Affairs expects to issue approximately 150 press releases announcing a range of regional accomplishments, including land clean-ups, job training graduations, infrastructure investment, legal settlements and important environmental and public health milestones. In addition, the office expects to develop responses, briefings and in some cases, site visits for several hundred Congressional/government queries and more than 500 media queries. OPA will also coordinate Freedom of Information Act responses to an estimated 600 requests and will complete roughly 400 web projects. On the internal communications front, OPA will distribute more than 300 internal messages related to job postings, regional events, trainings and the like.

BACKGROUND

The Office of Public Affairs supports Region 9 program divisions, the Regional Administrator's office and Headquarters' Office of Public Affairs in raising external and internal awareness of R9 and agency priorities, particularly EPA's work in communities to: clean up contamination, provide safe and clean drinking water, invest in critical infrastructure, work with local, state and tribal governments to protect public health and environment and ensure that delegated authorities are properly implemented. In fiscal year 2018, OPA expects to continue and enhance this vital communications work.

ORGANIZATIONAL STRUCTURE

OPA is part of the Regional Administrator's office, with a Director, Deputy and two sections.

Press, Congressional and Video Section:

- **OPA's Press Team** is broken into geographic beats, with press officers assigned to cover the following five areas: Northern California, Southern California, San Joaquin Valley, Arizona/Nevada, and Hawaii/Pacific Islands. The press team handles a heavy volume of external communications, proactive media outreach, press events, field visits and public meetings.
- **OPA's two Congressional Liaisons** respond to Congressional Members (73 Members from House and Senate for Arizona, California, Hawaii, Nevada, and Pacific Islands) and State-elected and Intergovernmental inquiries/incoming correspondence on a variety of environmental issues
- **OPA's Videographer** produces, directs, writes and edits video content designed for both internal and external audiences. The videos highlight EPA events in Region 9, project completions, internal trainings and 'in the moment videos' for use on social media channels.

Web, Social Media, Internal Communications, EIC/Library and Freedom of Information Act Section:

- **OPA's Web Team** maintains Region 9's web content, working with program offices to update existing Web pages and create new online resources. This team also manages the region's social media channels, including Facebook and Twitter accounts.
- **The Environmental Information Center / Library** responds to public requests for information and assistance, providing high-quality customer service for more than 3,000 annual inquiries. The EIC also provides EPA staff with research, needed documents and borrowed materials.
- **The FOIA team** coordinates responses by Region 9 programs to about 700 requests annually.
- **Internal Communications:** More than 350 internal messages a year are developed, managed and formatted by OPA with EMD and other originators to ensure delivery of consistent, accurate, timely information to regional staff and managers. Our team also maintains online, Region 9's intranet, where staff can access the latest news and an array of online resources.

PRIORITY FY18 COMMUNICATIONS WORK

1. Communities

OPA will continue to raise the profile of R9's on-the-ground work, highlighting investments in and support for communities, oversight of programs delegated to states and tribes, EPA's role in emergency responses and hazardous waste cleanups and efforts to convene local, tribal and state partners in tackling the region's biggest environmental and public health challenges.

2. Grants

In FY18, OPA will enhance coordination with HQ, EMD and R9 program offices to publicize EPA funding of critical projects. In FY18 this effort resulted in increasing numbers of announcements regarding drinking water projects, scientific research, and partnerships with private companies exploring topics like new biodegradable plastics and specialized air monitoring equipment.

3. Infrastructure

About 80 percent of Region 9's operating budget is expended in grants and contracts in the region. A large portion goes toward critical drinking water and wastewater infrastructure through the Drinking Water and Clean Water State Revolving Funds. OPA will work with local and state partners to highlight the impact of this funding in communities around the region.

4. Emergency Response

OPA will continue to work with Superfund on media and governmental engagement around high-profile emergencies, natural disasters and removal actions. In FY18, OPA expects to send several press officers to major incidents, including the response and cleanup related to Hurricanes Harvey and Irma. OPA continues to train and equip the press team to improve our responses to natural disasters, chemical explosions, oil spills and other emergencies.

5. Brownfields and Contaminated Land Cleanups

Underutilized and polluted properties present challenges for many R9 communities. EPA's brownfields and Superfund programs aim to remove pervasive contamination and, in places, return these sites to productive reuse for open space, commercial and residential development.

6. **State, Local and Tribal Coordination**

OPA coordinates closely with local, state and tribal communications teams, keeping them apprised of agency actions, announcements and policies. Frequently, OPA includes quotes, input and comments from state, local and tribal representatives in planning media events and in developing outreach materials including press releases, fact sheets, social media posts.

7. **Enforcement**

In coordination with local, state and tribal partners, OPA in FY18 will continue announcing key agency enforcement actions, including settlements, injunctive relief, facility and process improvements and efforts that enhance community safety and environmental protection.

FY18 WORK PLAN

Press

- Working with the R9 program offices, the Regional Administrator's office and HQ, OPA expects to **develop a strategic communications plan for FY18**, outlining key announcements, accomplishments, milestones and actions expected through Sept. 30, 2018.
- Over the course of FY18, we expect to issue about **2 to 3 press releases per week** (annually averaging about 140, including versions translated into Spanish and other languages). Each press release requires investment in time and coordination with the issuing division, Office of Regional Counsel, Regional Administrator's office and HQ
- For major actions and announcements, **OPA will develop individual communications strategies** summarizing the issue, background, key messages, FAQs and timeline of rollout.
- Using our experience in FY18 as a guide, OPA expects to receive approximately **825 inquiries from members of the media** over the course of FY18.
- Major categories of media interest pertain to **Superfund, Enforcement and Water divisions**, with queries for the Land and Air Divisions comprising most of the balance.
- Inquiries receive high priority to ensure reporters get relevant information by their deadlines.

Congressional

- For FY18 we forecast receiving approximately **500 Congressional and Intergovernmental inquiries**. Responses to the inquiries often require organizing a phone call with relevant Region 9 staff to answer questions posed by Congressional staffers.
- In addition, the region will continue developing a **plan for pro-active outreach in FY18 to key R9 Congressional offices** on issues and sites of interest; in the near-term, OPA will work with the Southern California Field Office director to schedule visits and other outreach to Congressional and other elected officials in the area.

- Over the next year **we expect to receive 35 letters** (controlled correspondence) from Congressional and Intergovernmental elected officials. Each incoming letter results in significant time spent to coordinate a written response with the division involved, and to close them out in HQ's electronic correspondence management system.

Video

- The need to tell a multi-layered story via video to our stakeholders has become vital, and in FY18, OPA expects to produce **several important video projects**.
- OPA's videographer expects to amplify Agency-wide messages and cover cleanups and environmental issues in a variety of communities.
- Such external videos go through an approval process by HQ before they can be published to the EPA YouTube Channel for public viewing. In FY18 we will highlight divisions' field work, including **redevelopment of brownfields/Superfund sites, the impact of water infrastructure grants and the deployment of new technologies for air pollution reduction**.

Web and Social Media

- OPA maintains Region 9's Web content by working with program offices to update existing Web pages and create new online resources, **completing 300 to 400 projects a year**.
- The Web team will continue the **transformation of existing content into the new OneEPA Web content management system as mandated nationally**, playing a leadership role in advocating for all Regions' interests.
- OPA supports regional programs and press office in public outreach via **our bi-monthly newsletter, reaching about 6,000 subscribers, social media, with over 8,000 Twitter and 17,000 Facebook followers**, and media kits for announcements and events, continuing to increase integration of online outreach and networks into regional communications.
- We expect to develop solutions in response to the 2018 phase-out of Lotus Notes, including a new system for managing Web workflow, facilitating the transition to a new national system for publishing Superfund site information, and ensuring public access to other Web assets.

Environmental Information Center / Library

- The EIC supports regional activities by providing background research on businesses, properties and individuals, performing **2,000 searches annually based on more than 500 staff requests**.
- We manage and respond to public requests for information and assistance, **providing high-quality customer service for more than 3,000 annual inquiries**, coordinating with other Public Affairs functions and saving program staff time and effort.
- The EIC also provides EPA staff with research, needed documents, borrowed materials and other assistance in carrying out their program work, maintaining a valuable collection of on-site and electronically available information holdings.
- The library will also continue educate staff on the variety of resources available to support their program work, increasing their ability to easily access science-based literature and tools.

Freedom of Information Act

- **OPA coordinates responses by Region 9 programs to about 700 FOIA requests annually, further improving upon our on-time rate, which is already one of the best in EPA.**
- The FOIA team will work with OEI's FOIA and e-Discovery programs to spur improvements to FOIAonline, centralized email search support, and other facets of the national program that significantly hinder our ability to respond to requests in a timely and efficient manner.
- The team will **collaborate with ORC and program division management and FOIA coordinators to implement recommendations of the FOIA Lean team**, such as creation of a FOIA Response Team to coordinate work on a large or complex request and conducting more regular meetings of divisional FOIA Coordinators.
- OPA also facilitates efficient local searches of legacy Lotus Notes mailboxes until OEI completes migration of Notes mail to Outlook.

Internal Communications

- All-employee emails – **more than 350 a year** – are developed and formatted with EMD and other originators to ensure delivery of consistently accurate, timely information to regional staff and managers.
- **gonline, the Regional intranet, hosts an archive of all-hands emails, an events calendar, and multiple pages that describe available employee services and administrative information.** Staff are kept up to date through articles on R9 activities and regular 'Career Moves' and 'New Faces.' Employees are profiled in-depth in our 'Behind the Scenes' posts, and a new series, 'Regional Spotlight,' describes accomplishments of staff around the Region.
- Initiatives with EMD include outreach to staff via **video and gonline to promote Lean training and projects**; posting and updating of divisional org charts; and video and other tools to introduce new staff and potential recruits to EPA Region 9.
- In FY18 we will also continue to expand use of the **elevator lobby monitors to highlight staff accomplishments**, upcoming events, important news, building updates, and new opportunities for employee engagement.
- **'News this Week' emails, typically sent weekly, contain links to new content on gonline**, as well as reminders about deadlines for things like transit subsidy worksheets, mandatory training and the Combined Federal Campaign.
- Additional services (such as photographing events, compiling daily news clips, and consulting on in-reach campaigns) contribute to enhanced communication and workplace quality of life.

REGIONAL COMMUNICATIONS SUPPORT

- In addition to communicating regularly with each program division through their designated liaisons, **OPA Director meets quarterly with each Division Director to ensure that OPA is meeting the needs of each client division**, to project important division announcements over

the next six months and to solicit feedback about OPA performance and areas for improvement.

- **In FY18, OPA will attend 1-2 all-hands meetings in each division** to highlight OPA-divisional coordination, educate new staff about OPA's work and gain staff input on upcoming actions.
- **OPA provides monthly updates to the Senior Management Team** on upcoming press announcements, Congressional meetings and public events, OPA workload, emergency deployments and highlights of recent media campaigns.
- **OPA continue to improve the readiness of Public Information Officers for deployment to regional and national emergencies, incidents, natural disasters and other events.**
- Working closely with Superfund, **OPA is developing a training plan, equipment list, set of best practice guides for crisis communications and regional workflow planning** for outreach materials related to emergency incidents.